PERKINS V

MANAGEMENT GUIDE
2020–2021

CTE®
Learning that works for Nebraska

NEBRASKA DEPARTMENT OF EDUCATION

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INTRODUCTION

How to Use this Management Guide

The Perkins V Management Guide has been developed to be the main and trusted source of information for CTE administrators when administering CTE programs in Nebraska. All grant recipients (schools, consortia, and community colleges) are expected to adhere to the policies and procedures discussed in this guide for audit compliance and program quality purposes.

The Management Guide's sections are outlined in the Table of Contents and serve as a comprehensive reference guide for CTE administrators on a variety of topics including:

- Nebraska's CTE Framework
- Program Administration
- Program Implementation
- Data Reporting and Accountability
- Grant Management
- Monitoring/Auditing

This guidance will be updated as needed. Changes will be indicated and described in the Change Summary at the end of the Guide.

Nebraska's CTE Framework

From a beginning in the early 1900's that focused on training young men to return to the farm, CTE has been an important part of education in Nebraska. For over a century, as part of comprehensive high schools and postsecondary institutions, CTE has provided students with necessary academic, technical, and career readiness skills for postsecondary education and employment. But, Nebraska and our world continue to evolve. Moving from a reliance on the steam engine to the everyday use of the search engine, rapid changes in artificial intelligence, automation, globalization, shifting demographics, growing student loan debt, and increased emphasis on educational accountability have provided the impetus for strengthening the design and delivery of CTE in Nebraska.

Beginning in 2018 and in preparation for developing a new State plan, the NDE and Nebraska CTE engaged numerous stakeholders from across the state representing K-12, postsecondary, business and industry, workforce and economic development, parents, students, and those representing special populations to develop a conceptual framework and theory of action for moving its high-quality CTE system forward. This framework, including a mission and vision statement, guiding principles, and a list of strategic priorities, sets the stage for the work to be completed.

Nebraska CTE should be viewed systematically by taking a broad perspective in evaluating its contributions to the state's economic future, rather than focusing on discrete secondary or postsecondary programs or specific funding streams. The State plan for Perkins V provides support to implement this updated framework for Nebraska CTE.

MISSION

To lead and support the preparation of all Nebraskans for learning, earning, and living.

VISION

Nebraska Career & Technical Education will deliver coordinated, relevant learning opportunities that engage each student in high-quality, rigorous education. These opportunities will be enhanced by partnerships with business and industry, workforce, and economic development leaders, allowing learners to turn their passion, talents, and strengths into successful careers and fulfilling lives.

GUIDING PRINCIPLES

Primary to this vision are four guiding principles. These principles are recognized to provide focus to the work of Nebraska CTE and intended to result in outcomes aligned to the mission and vision. They are foundational to all efforts:

1. **Equitable**.
   Nebraska CTE champions all schools, community colleges, and communities in developing and maintaining a culture that supports learning opportunities for all students, across all backgrounds and circumstances, so that they receive meaningful access to and opportunities for success in high-quality CTE programs and personalized career development. Educational equity allows learners to discover and explore their passions and make meaningful connections within the context of their postsecondary interests.

2. **Relevant**.
   Nebraska's CTE system is driven by future economic and workforce demands and created in partnership with the community and engaged stakeholders. All learning is facilitated by knowledgeable experts.

3. **Innovative**.
   Nebraska CTE will be bold in its approach to creating new solutions for addressing educational and workforce challenges. Co-curricular and expanded learning experiences (e.g. work-based learning, entrepreneurship education, and career and technical student

organizations) allow learners to apply, demonstrate, and refine their connected academic, technical, and career readiness skills.

4. **Coordinated**.
   Nebraska CTE works alongside state and local agency, education, and community partners to be proactive, responsive, and adaptive to state and local workforce needs and increase the visibility and coherence of services provided.

STRATEGIC PRIORITIES

In response to the Perkins V areas of emphasis and extensive stakeholder engagement, Nebraska CTE has established the following eight strategic priorities to realize its vision. The goal of these priorities is to build onto and catapult Nebraska's high-quality CTE system forward and respond to workforce needs, labor market information, and economic development priorities.

1. **Aligned CTE Programs**
   - The careers we prepare learners for are constantly emerging and changing. CTE programs afford learners the opportunity to explore career options, identify their interests, and develop the knowledge and skills that prepare them to transition to postsecondary education and into entry-level careers. These programs must be well aligned to the next opportunities learners will encounter and keep pace with the constant evolution found in the marketplace.
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well aligned to the next opportunities learners will encounter and keep pace with the constant evolution found in the marketplace.

- Alignment between Nebraska's secondary and postsecondary CTE systems means that they are: (1) intentional and seamless, with no duplication of content; (2) accessible to each student, including those with interests in dual-credit and workplace experiences, and (3) incentivized for key economic and employer needs.

2. **Systemic Career Development**
   - Career development is the process by which individuals get to know their strengths and interests, learn how different jobs connect with those interests, explore careers in current labor markets, and build career planning and management skills to achieve their goals. There are multiple pathways to rewarding careers, and the components to effective career development include self-awareness, career exploration, and career planning and management.
   - Career development programs equip learners with the skills needed to take ownership in navigating their own career pathways. Career development is positive student development – if students see the relevance and meaning in school, it results in improved interest and academic performance. Students become more motivated, self-directed learners when they understand the relationship between academics, education planning, and achieving their own career goals.
   - Career development must be systemic – intentionally infused throughout all levels and areas of K-12 and postsecondary education. Every adult within an educational setting has a role in students' career development progress.

3. **Student Achievement**
   - Nebraska CTE provides an educational environment that can integrate core academic and technical preparation for contextualized learning that increases engagement and supports improved academic, technical, and career readiness achievement for all students. Nebraska CTE is responsible for analyzing student performance data to assess its effectiveness in achieving statewide progress in CTE, which is measured by core indicators of performance for both secondary and postsecondary education, and providing support for eliminating inequities in student access to and success in high-quality CTE programs of study. Student mastery of technical and career readiness skills are often demonstrated thorough CTSO competitive events.
   - The Nebraska State Board of Education approves content area standards for all content areas including CTE. Nebraska CTE drives rigorous content area standards implementation through programs of study.

4. **Data Use**
   - Nebraska CTE will assist educators in making a more formal shift from collecting data to using data to ensure local CTE programs create success for students and employers.

- The quality and effectiveness of Nebraska CTE is dependent on the ability to constantly evaluate and improve. Through the reVISION process, all local recipients are required to analyze disaggregated student performance data to identify performance disparities across student groups, detect root causes, and direct resources towards addressing both.

5. **Work-Based Learning**
    - Work-based learning strategies connect learners with employers to prepare them for success in an ever-changing workplace. Work-based learning is a planned program of sustained and meaningful experiences related to the career interests of a learner that enable him or her to acquire knowledge and skills in a real or simulated work setting. It requires strong partnerships between schools, postsecondary institutions, and local employers.
    - Work-based learning is learning through work, not learning about work.
    - Nebraska will evaluate the quality of secondary CTE programs, in part, by the percentage of CTE concentrators who participate in high-quality work-based learning experiences. An effective means to monitor, evaluate, and promote these experiences is foundational.

6. **Sustained Professional Development**
    - Effective Nebraska CTE programs require highly prepared instructors, administrators, staff, and support personnel who are supported by sustained, high-quality, and relevant professional learning opportunities. Nebraska CTE professional development includes effective training at both the pre- and in-service levels and the pursuit of advanced credentials and degrees. It additionally supports those who have utilized an alternative pathway to certification and encourages the recruitment of new and diverse CTE teachers, especially in shortage areas.

7. **Instructor Recruitment and Retention**
    - To deliver effective and relevant CTE programming, there must be an adequate supply of qualified instructors who are knowledgeable in pedagogy and technical areas as well as in academic competencies and workplace requirements essential to their CTE program areas. Innovative and bold strategies must be employed to recruit and retain CTE teachers, especially in those areas with teacher shortages.
    - Retaining CTE educators requires deploying innovative strategies and may differ by school, institution, region, or content area.

8. **Middle School CTE**
    - Middle grades (5th – 8th) CTE adds relevance to students' learning experiences by exposing them to real-world options and connecting academics to career and postsecondary possibilities. It equips students with transferrable skills needed as they transition to high school and beyond, and serves as a key dropout

prevention strategy mitigating challenges such as disengagement and lack of preparation.
- Nebraska middle school CTE programming must be aligned with the overarching CTE system, encourage hands-on career exploration opportunities, and available to each student.

Guiding Assumptions

Perkins V maintains much of the program improvement emphasis of Perkins IV, but requires Nebraska CTE to focus on additional areas as well. The following guiding assumptions are instrumental in moving Perkins V forward:

- Federal Perkins V funding for Nebraska CTE is not an entitlement at either the state or local level.
- The use of Perkins V funds must be focused on school improvement and increased student achievement outcomes.
- CTE and academic core content must be integrated in a comprehensive way connecting the core academics in CTE courses.
- Students must participate in systemic career development at all levels of education.
- The skills needed for success in postsecondary education and careers are one and the same.
- CTE must be strategically positioned within the broader vision, mission, and goals for education in the state of Nebraska.

Areas of Emphasis

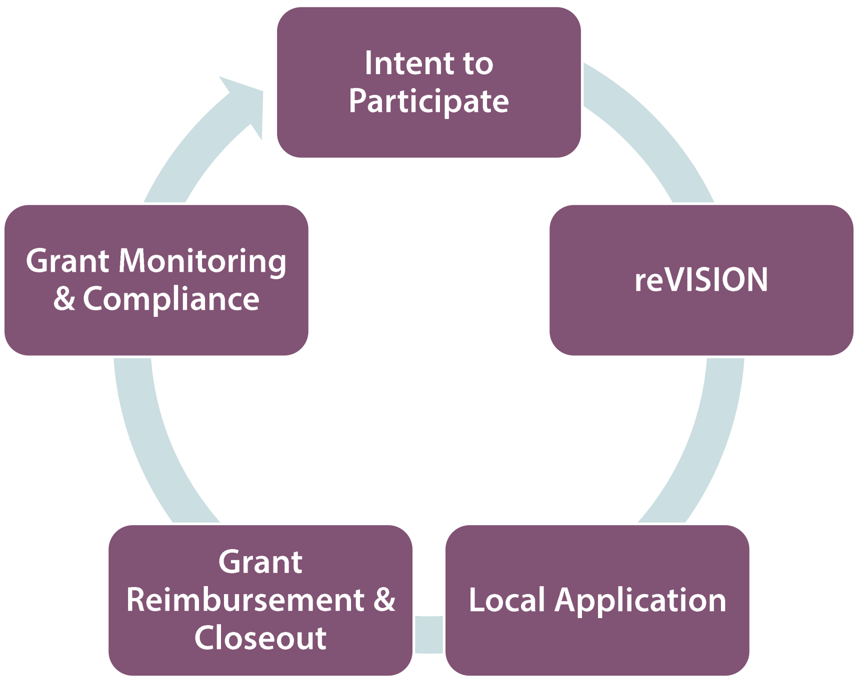
Perkins V requires Nebraska and local recipients to put emphasis in areas designed to result in program improvement and increased student achievement. These areas include:

- Driving program improvement through programs of study.
- Requiring data-driven decision making on local spending through the new comprehensive local needs assessment (reVISION), involving significant stakeholder consultation and a focus on disaggregated data.
- Using the increased statewide Perkins reserve fund to spur local innovation and implementation of programs of study.
- Supporting career exploration in the middle grades (grades 5-8).
- Enhancing program quality, including a new secondary program quality performance indicator.
- Increasing the focus on serving special populations, including an expanded definition and required uses of statewide Perkins leadership funds.

PROGRAM ADMINISTRATION

Grant Overview

The Perkins V grant process encompasses five components:



Eligible Recipients

Under Perkins V, eligible recipients include local educational agencies, area career and technical education schools, educational service agencies, Indian Tribes, Tribal organizations, Tribal educational agencies, or a consortium eligible to receive assistance under section 131 of the Act, or, an eligible institution or consortium of eligible institutions eligible to receive assistance under section 132 of the Act.

Eligibility is contingent upon recipients' completion of the NDE's reVISION process, submission and approval of the Local Perkins Application and annual budgets, and the annual confirmation that CTE Essential Components are in place, which indicate CTE programs of are of sufficient size, scope, and quality to be effective and meet the needs of all learners.

A secondary school district must qualify for a minimum allocation of $15,000 or join/form a consortium with other eligible recipients. A postsecondary institution must qualify for an allocation of $50,000 or join/form a consortium with other eligible recipients. See below for more information about Perkins consortia.

Intent to Participate

Each year Nebraska public secondary schools and community colleges - referred to as the local education agency (LEA) in the Act - will be asked to indicate their intent with regards to participating in the Perkins grant program administered through the NDE.

The LEA allocation will be made on a single fiscal year basis. The allocation to each LEA is calculated using a formula established in the Federal legislation and published in the Nebraska Perkins V State Plan. LEAs will be notified of their annual allocation. Perkins funds should be used to improve or expand CTE programs, not maintain them.

Secondary

The NDE will use the Perkins V Intent to Participate Tool through the NDE portal for local secondary school districts to declare their intent to participate in Perkins V for the fiscal year. Completing the requested information will accomplish the following:

- Affirm the LEA meets the essential components requirement for participation
- Identify the active Career and Technical Education Student Organizations (CTSO) offered and available for student participation in the local district
- Declare the district's intent to participate by identifying their participation option. LEAs can choose one of three participation options:
    - If the LEAs allocation is greater than $15,000, the LEA can either accept the federal funds and operate its own program or choose to participate in a consortium;
    - If the allocation is less than $15,000, the LEA must enter into a consortium managed by an educational service unit (ESU) or other eligible recipient(s) in order to meet the $15,000 minimum allocation requirement; or
    - The LEA can decline the allocation.

Waivers and Exemptions:

Per section 131(c)(2) of Perkins V, requests for an exemption from consortia membership will be limited. The requirement will be waived only in instances where the requesting district is able to demonstrate, through detailed documentation, it is:

- Located in a rural, sparsely populated area; and
- Unable to enter into a consortium for purposes of providing activities under Perkins.

Postsecondary

Postsecondary institutions will declare their intent to participate by responding to the written request for information annually.

LEAs on the postsecondary level can choose one of three participation options:

1. If the LEAs allocation is greater than $50,000, the LEA can either accept the federal funds and operate its own program or choose to participate in a consortium;
2. If the LEAs allocation is less than $50,000, the LEA must form a consortium with other eligible recipients in order to meet the $50,000 minimum allocation to participate; or
3. The LEA can decline the allocation.

Waivers and Exemptions:

Per section 132(c)(1) of Perkins V, there are no waivers or exemptions for the minimum allocation for postsecondary institutions or postsecondary consortiums.

reVISION

Since 2012, the NDE's reVISION process has been instrumental in improving and strengthening CTE in Nebraska. This process provides Nebraska schools with the opportunity to analyze and transform their current CTE systems in order to improve their ability to educate a qualified workforce that meets industry needs within an ever-changing economy.

To satisfy the Perkins V requirement for the development and implementation of a comprehensive local needs assessment, reVISION, given its success and reach, was updated and expanded to meet the required elements of the Act.

As Nebraska CTE transitioned from Perkins IV to Perkins V, reVISION was used as the foundation for local CTE implementation – it was the foundation for developing the local application (for stand-alone districts, consortia, and community colleges) and future spending decisions. It was a chance for all schools and community colleges to take an in-depth look at their entire local and regional CTE system and identify areas where targeted improvements could lead to increased opportunities for student success. reVISION, if implemented thoughtfully, will be a powerful opportunity for local educators to engage stakeholders in a common understanding and vision for the future of CTE in their community.

Each district and community college in Nebraska desiring to operate as an approved CTE program and receive Perkins funds is **required** to complete the reVISION process. Additional information about the reVISION process can be found at: https://www.education.ne.gov/nce/revision/.

Perkins Consortia

After the reVISION process has been completed, LEAs may elect to form or join a Perkins consortia. LEAs who do not meet the minimum allocation threshold as described above in the Intent to Participate section are required to participate as a member of a consortia or request a waiver (for secondary recipients). For Perkins V funding purposes, funds allocated to a consortium (formed to meet the requirements of Section 135) will be based on the amount that would otherwise be distributed each LEA.

Because a consortium submits one four-year local application on behalf of all member schools or entities, it is strongly recommended that LEAs remain in their consortia for the same time period. If a member school or entity decides to leave a consortium or terminate a cooperative agreement, they must appeal to the NDE.

Allocation of Funds Within a Consortium

Members of the consortium will jointly determine the method for identifying consortium activities and funding priorities based on each participating member's reVISION process, recommendations from any local or regional advisory committee, and funds available. The consortium must determine a fiscal agent, such as an ESU or a district/community college that is a member of the consortium. Members of the consortium must reach consensus upon the mutually-beneficial programs and purposes that Perkins funds will support. Members will describe the purposes and programs, aligned with the outcomes of the reVISION process, in the local Perkins application.

Funds may not be reallocated to individual members of the consortium for purposes or programs benefiting only one member of the consortium. Similarly, funds may not be "granted back" to an individual LEA. In other words, if a school generates $5,600 through the formula allocation and participates as part of a consortium, they are not guaranteed $5,600 to be spent on their CTE programs. The consortia must review the CTE needs of all schools and allocate funds on the consortia level based on reVISION outcomes and the local four-year application. For example, if the consortium decides to prioritize business education programs, all business education programs in the consortium must have the opportunity to benefit and participate in related programming or expenditures.

Any equipment or instructional materials purchased remain the property of the consortium and must be clearly identified as such. If an LEA chooses to leave a consortium, any equipment purchased by the consortium that has undepreciated value should be returned to the consortium.

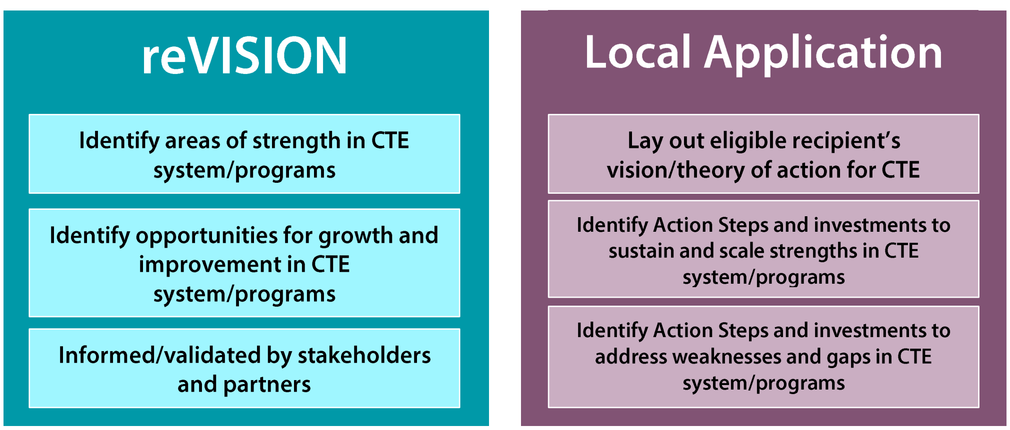
For competitive awards, any eligible recipient who completed the reVISION process and is interested in applying may do so, regardless of their participation within a consortium.

Local Application

The federal Strengthening Career and Technical Education for the 21st Century Act (Perkins V) provides resources to support educators in developing the academic, technical, and employability knowledge and skills of secondary and postsecondary education students enrolling in CTE programming.

The **Local Perkins Application** must be completed by all secondary and postsecondary (stand-alone and consortia) CTE providers seeking federal funding through Perkins V. Staff from the Office of Career, Technical, and Adult Education at the Nebraska Department of Education (NDE) created several resources to help LEAs in developing a strong application for Perkins V funding, one based on information that surfaced as part of the reVISION process. Only those needs identified as a result of the reVISION process and articulated through the local application will be considered for Perkins funding.

The Local Perkins Application asks LEAs to describe how they will use federal funds in strengthening CTE programming and expand student access to CTE programs. Under Perkins V, each state is required to submit a four-year plan to the U.S. Department of Education, Office of Career, Technical, and Adult Education (OCTAE) covering the 2020-2024 academic years. Local CTE providers (districts, consortia, and community colleges) receiving a Perkins V grant allocation are also required to submit plans with the same timeline committed. Submission of this Local Perkins Application will fulfill that eligibility requirement.



Visit https://www.education.ne.gov/nce/perkins-administration/ for additional information on the Nebraska Local Perkins application.

Required Uses of Perkins Funds

Per Section 135(b), funds made available to eligible recipients under this section shall be used to support CTE programs that are of sufficient size, scope, and quality to be effective that:

1. Provide **career exploration and career development activities** through an organized, systematic framework designed to aid students, including in the middle grades, before enrolling and while participating in a CTE program, in making informed plans and decisions about future education and career opportunities and programs of study;
2. Provide **professional development** for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals;
3. Provide within CTE the **skills necessary to pursue careers** in high-skill, high-wage, and in-demand industry sectors or occupations;
4. Support the **integration of academic skills into CTE programs** and programs of study;
5. Plan and carry out elements that support the implementation of CTE programs and programs of study and that result in **increasing student achievement of the local levels of performance;**
6. **Develop and implement evaluations** of the activities carried out with funds under this part, including evaluations necessary to complete the comprehensive needs assessment (reVISION).

Please refer to Section 135(b) of Perkins V for a comprehensive list of required and permissive uses of Perkins funds. Additional state guidance on allowable uses of funds can be found in the sections below.

Supplanting with Federal Funds

Supplanting occurs when federal dollars replace what is typically paid for by local/state dollars to support CTE programs and activities. If Perkins funds provided a service that the LEA is required to provide under local or state law, supplanting would occur. In other words, Perkins funds cannot be used for an LEA's general responsibilities.

Perkins funds must **supplement, not supplant** local or state funds. The filter is always to demonstrate that the expenditure of funds improves or expands CTE programs. In both cases, the expenditure of funds must be above normal operational expenses. Here are some examples:

- *It would be appropriate to print outreach materials and recruitment brochures for single parents, students whose parents are active duty military, or students who are English learners, but not to expend funds on printing the general course or college catalog.*

- *Replacing an old or worn out piece of equipment with a similar piece of equipment would be supplanting local fiscal responsibility. Replacing equipment to upgrade it to current industry standards would be an approvable use of Perkins funds.*
- *It would be appropriate to refer a student to a remedial or developmental course as needed, but not to pay for an instructor's salary in that course.*

Obligating Funds

The beginning date when funds can be obligated for approved grant activities cannot precede (1) the receipt of an approvable application with a budget request for funds for formula grant programs or (2) notification of approval and issuance of the grant award notification (GAN) for competitive and discretionary grants. Obligations/Purchase Orders cannot be made prior to or after the Grant Period.

Obligations/Purchase Orders cannot surpass the 25% allocation limitation (from July 1 to September 30), or after the ending dates of the grant. Following are some guidelines for when Perkins V funds are considered obligated (from 34CFR 76.707):

Type		When
Equipment and supplies	→	Date of purchase order
Work of employees	→	When work is done
Contracted services	→	Date of written agreement
Travel	→	When travel is taken

Payments for State and Federal grants are made on a reimbursement basis only. There are no scheduled payments nor advance payments.

Although the Federal fiscal year is October 1 to September 30, the Strengthening Career and Technical Education grant (Perkins V) becomes available on July 1. Only 25% of the grant funds are available from July 1 – September 30. The remainder of the grant becomes available on October 1.

See more guidance at Grants Management System: www.education.ne.gov/gms2/

Reallocation of Perkins Funds

Federal funds that are not applied for as of September 1 of the current fiscal year will be reallocated by formula for use during the following fiscal year to LEAs with applications approved for federal funding. The Perkins Act does not allow LEAs to carry forward funds to the next year.

Meeting the Needs of Special Populations

Efforts that advance educational equity help to ensure that all students have the resources they need to graduate prepared for success in postsecondary, career, and civic life. Both the ESSA and Perkins Act give greater responsibility to states and districts to advance equity at the local level.

Special populations include:

- Individuals with disabilities
- Individuals from economically disadvantaged families, including low-income youth and adults
- Individuals preparing for nontraditional fields (students who are in programs or employment in occupations in which their gender comprises less than 25% of total employment)
- Single parents, including single pregnant women
- Out-of-workforce individuals
- English learners
- Homeless individuals
- Youth who are in, or have aged out of, the foster care system
- Youth with a parent who is a member of the armed forces and is on active duty

Nebraska Career Education must be available and provide services to all students, including those from special populations. Special emphasis must be given to the success of special populations in CTE courses.

Through Nebraska's reVISION process, local recipients are required to work collaboratively to assess performance data for all students across all special populations, identify performance gaps, positive or negative trends, and identify strategies for addressing any disparities in performance. These findings must be carried through to each recipient's local Perkins application and annual application for Perkins funds. Within the application, a description of how students from special populations are provided with programs that enable them to meet or exceed State determined levels of performance, and prepare them for further learning in high-skill, high-wage, and high-demand occupations is required.

Several resources have been created to assist local recipients in supporting students from special populations .These resources will help recipients develop plans to address the equity gaps for special populations that were discovered during the Perkins V reVISION process. Your Perkins V Indicator Report provides you with performance data disaggregated by gender, race, and each of the nine special population groups.

Specific strategies targeting each of the nine special populations can be found here:
www.education.ne.gov/nce/nontraditional-special-populations/

Use this resource with your team to identify potential strategies to address the root causes of your identified gaps in participation and performance. Utilize the recommended state and national organizations to support your efforts and to locate similar local organizations that serve students in your community. Target your strategies to address the needs of each of the special population groups to increase the potential for success. With the right support, your students who are members of a special population can achieve amazing results and discover a new world of opportunities.

Size, Scope, & Quality

Pursuant to section 135(b) of the Act, Perkins funds may only be available to programs meeting the following minimum criteria to ensure local recipients' CTE systems are of sufficient size, scope, and quality to meet the needs of all students served.

The following definitions are intentionally framed around Nebraska CTE's Guiding Principles to provide coherence to the Nebraska CTE system. The Essential Components of Size, Scope, and Quality listed below apply to secondary CTE programs.

Size refers to the quantifiable evidence, physical parameters, and limitations of each approved program that relate to the ability of the program to address all student learning outcomes. Generally, size will be defined by items such as the required number of programs, and availability of facilities and equipment to ensure quality, equity, and access.

Scope provides curricular expectations of each program and/or program of study to cover the full breadth of its subject. Generally, scope involves appropriate sequencing of courses, career development, early postsecondary and work-based learning opportunities, the role of advisory committees, and the role of Career and Technical Student Organizations (CTSOs).

Quality refers to the strength of the overall system components, including the extent to which these components positively impact student outcomes.

EQUITABLE		
Size	Scope	Quality
Each student, including those from special populations, is provided with equitable **access** to CTE programs and activities, including CTSOs • Alternative education programs include CTE • Emphasis is given to the recruitment and retention of students into programs	• CTE students are provided with an ongoing, organized, systemic framework for **career development** from middle grades through postsecondary; • Career guidance and development information and support are available to all students	Recipients meet or exceed **performance** targets established for state and federal Perkins accountability indicators • Accountability and enrollment data, per Section 113, are available and submitted annually

non-traditional for their gender	Secondary: • All secondary students develop and maintain a personal or individualized learning plan • A career information system (such as Nebraska Career Connections) is available for all student and parent use • Secondary programs utilize the Nebraska School Counseling Model and the Nebraska Career & Technical Education Model (https://www.education.ne.gov/nce/careerdevelopment/)	• Resources are directed towards addressing disparities in performance across subpopulations of students • Accessibility and/or accommodations are provided to each student, including those who are members of a special population

RELEVANT		
Size	Scope	Quality

Local CTE systems include programming inclusive of opportunities that represent the broad range of available Nebraska CTE career fields/program areas, including:
• Agriculture, Food, and Natural Resources
• Business, Marketing, and Management
• Communication & Information Systems
• Health Sciences
• Human Sciences and Education, and
• Skilled and Technical Sciences
 	
At the secondary level:
• No less than one state-model program of study shall be offered, and
• No less than one state-authorized Career & Technical Student
	• CTE programs are aligned to the Nebraska Career & Technical Education Model (see Figure 2).
	• A comprehensive understanding of and strong experience in all aspects of an industry are provided to students, including:
	  ○ occupations and careers that represent the full scope of an industry;
	  ○ technology, workforce and community issues, and health, safety, and environmental issues related to the industry
	• Emphasis is placed on developing essential workplace skills through integration of Nebraska's Career Readiness Standards throughout the local
		• CTE programs of study and courses are delivered by instructors who meet Nebraska's requirements to teach at the secondary and/or postsecondary level(s)
		Professional development is provided to school counselors, teachers/instructors, paraeducators, and administrators to enhance student learning
		• Professional development includes both technical and pedagogical knowledge and skill development opportunities
		• Contextual learning opportunities are embedded across content/program areas
		• High quality, standards-aligned instructional

Organization (CTSO) aligned with the CTE courses and content offered in the school(s) is available for student participation. At the postsecondary level: No less than one program in each of Nebraska's career field areas that maintains an occupational focus and prepares students for entry level employment, advanced skill development, and/or advanced training as identified through the reVISION process will be offered, and • No less than one state-authorized CTSO at the primary campus level, if applicable	education system or institution • CTE programs are aligned with local/regional workforce and economic development efforts • Appropriate assessments, both formative and summative, are utilized to measure and encourage student achievement; • CTE programs include opportunities for dual-credit and/or credentialing Secondary: Secondary CTE course instruction addresses at least 90% of the state-approved standards	materials are accessible to each student • Industry-grade equipment and technology encourage student attainment of relevant, rigorous technical skills; • Facilities, equipment, and resources are of sufficient size and quality to accommodate participating students and keep them safe

INNOVATIVE		
Size	Scope	Quality
• Local CTE systems provide opportunities for students to participate in coursework through a wide array of delivery models, including classroom, lab, workplace, and other applied experiences	• Promotion of expanded learning and leadership opportunities for students through components such as workplace experiences and CTSOs • Opportunities for students to participate in distance and/or blended CTE programs and courses	• Offering meaningful workplace learning opportunities to all students, including those from special populations, that align with their CTE programs of study

COORDINATED		
Size	Scope	Quality
• Local CTE program offerings are informed by labor market information (LMI) to identify alignment	• Alignment between secondary and postsecondary CTE programs with evidence of	• Career pathways offer multiple entry and exit points for students

to regional and statewide employment projections • Essential partnerships are established that link CTE in schools and community colleges with business and industry, workforce, economic development, and government agencies	joint planning. This may include but is not limited to articulation agreements, dual-credit opportunities, opportunities for the attainment of industry recognized credentials, and aligned CTE curriculum • CTSOs are aligned with CTE curriculum	• Partnerships are developed to enhance CTE • CTE programs and programs of study offerings are systematically reviewed by the local or regional advisory council for alignment and quality • Secondary and postsecondary partnerships assist in student transitions • Parents, students, and stakeholders are consulted, as appropriate, for input and evaluation of CTE programs

Programs of Study

State Model

<u>Secondary</u>:

Nebraska currently supports 65 secondary state model programs of study inclusive of all 16 nationally recognized career clusters. Each program of study includes an introductory, intermediate, and capstone course and collectively are organized into six career fields:

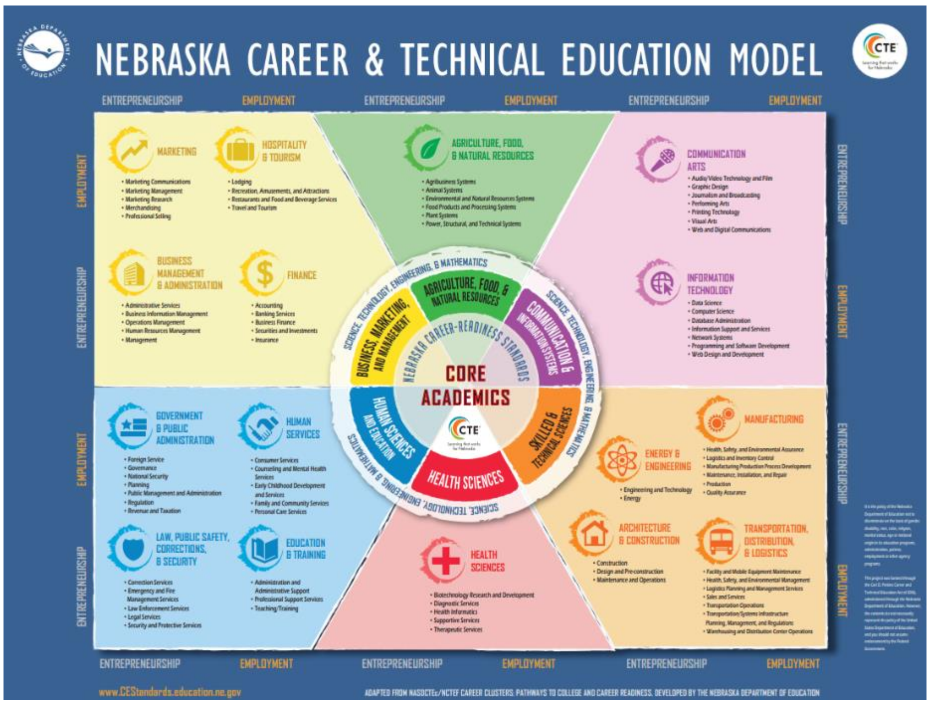
1. Agriculture, Food, and Natural Resources
2. Business, Marketing, and Management
3. Communication and Information Systems
4. Health Sciences
5. Human Sciences and Education
6. Skilled and Technical Sciences

State model programs of study are developed to:

- assist secondary schools in creating meaningful sequences of courses that adequately prepare individuals for seamless transitions to postsecondary education and careers eliminating duplication of coursework;
- assist students in identifying appropriate courses for high school and postsecondary education that lead to their chosen career;

- encourage collaboration between secondary and postsecondary education through curriculum alignment;
- offer opportunities for high-quality workplace experiences aligned to students' career interests;
- promote the advancement of early postsecondary opportunities (including dual-credit courses) for all students; and
- support postsecondary education options for students to further prepare them for successful transitions to their future careers.

These programs of study are organized around Nebraska's CTE Model and can be found at: http://cestandards.education.ne.gov.



When developed, these **state model programs of study are**: coordinated, nonduplicative sequences of academic and technical content at the secondary and postsecondary levels that incorporate challenging State academic standards, address both academic and technical knowledge and skills, including Nebraska's Career Readiness Skills, are aligned with the needs of industries in Nebraska's economy, progress in specificity, have multiple entry and exit points that incorporate credentialing, and culminate in the attainment of a recognized postsecondary credential.

These state model programs of study assure that students across Nebraska have an equitable opportunity to participate in high-quality programming, regardless of where their district is located or what school they attend.

Each secondary local recipient must adopt and offer at least **one state model program** of study to be eligible for Perkins V funds.

Nebraska CTE will continue to work with postsecondary education leaders and other industry stakeholders to more clearly define a credential of value (at both the secondary and postsecondary level). This work will ensure alignment between the needs of business and industry and education and be instrumental in the development of state model programs of study.

Each state model program of study is published and available on the Nebraska CTE standards website: http://cestandards.education.ne.gov/. By career field and career cluster, each program of study is displayed with links to the related course-based standards. Additionally, information pertaining to appropriate teaching endorsements, middle school CTE, and supplemental resources are available on this site.

Postsecondary:

Community colleges have the flexibility to develop programs independently. These programs will be reviewed and approved by the State with a focus on both academic and CTE courses required to reach the appropriate credential, certificate, or degree as well as opportunities to articulate to four-year colleges and universities. Specifically, Nebraska CTE will work with the CCPE to strengthen the role of postsecondary CTE program approval through their existing program approval process to ensure Perkins criteria are considered and that communication and approval decisions are shared.

Locally Developed

If an eligible secondary grant recipient identifies a workforce need in their local region not addressed in a state model program of study, they may submit a request to have a locally developed program of study approved. The need for a local program of study must be justified by:

- describing how the program of study will meet local and/or regional workforce needs, including economic and workforce data that justifies the local program of study, and
- how the program of study aligns to the state's economic priorities that are not currently addressed in any existing state model program of study. Alterations or modifications to existing state model programs of study are not permitted. Results from the reVISION process will be instrumental in justifying the need for a local program of study.

The required components of a local program of study include: (1) a credit-bearing introductory course, and (2) a minimum of two credit-bearing CTE courses to develop the appropriate knowledge and skills in preparation for employment or entrepreneurship.

Additionally, applicants must submit information to the NDE that ensures the proposed local program of study meets certain quality criteria and is at the same level of rigor as existing state model programs of study. Applicants must demonstrate how the new program of study:

- meets local and/or regional workforce demands and economic priorities that are not currently addressed in any existing state model programs of study,
- relates to high-wage, high-skill, and high-demand occupational preparation and Nebraska's economic priorities,
    - The Nebraska Departments of Education, Labor, and Economic Development developed the following website: http://h3.ne.gov/H3/ to provide information on Nebraska's High-Wage, High-Skill, and High-Demand occupations
- aligns to the efforts of appropriate Nebraska sector partnerships and other statewide workforce development efforts, and
- aligns with recommended academic and technical courses

Program Approval

Each locally developed program of study submitted for approval is reviewed by Nebraska CTE staff for its rigorous course standards and progressive, sequenced courses, secondary and postsecondary alignment, labor market demand and industry involvement, high-quality instruction, and inclusion of workplace learning experiences. Additionally, how the program of study promotes continuous improvement in academic achievement and technical skill attainment, expands access to CTE for special populations, and how it supports the inclusion of Nebraska's Career Readiness Skills.

To ensure the approved local program of study meets the quality indicators above and to determine how successful the program was in accomplishing its goals, an annual report must be submitted to the NDE. This report will outline and demonstrate the local recipient's continuous improvement efforts in the academic achievement and technical skill attainment of its students, support for the inclusion of Nebraska's Career Readiness Standards within the local program of study, activities and strategies that expand access to CTE programs so that each learners, including those from special populations, is served equitably, and uses the latest information and labor market data to maintain relevance.

The elements within secondary state model programs of study implemented locally along with approved local programs of study will be reviewed by Nebraska CTE staff annually. This will encompass desk audits of annual activities and an assessment of the extent to which the size, scope, and quality Essential Components as described in section B(2)(h) of this plan are implemented. On a rotation and intermittently, programs will also have on-site monitoring visits reviewing the same criteria.

Postsecondary institutions have the flexibility to develop programs independently. These programs will be reviewed and approved jointly by the CCPE and Nebraska CTE with a focus on both academic and CTE courses required to reach the appropriate credential, certificate, or degree as well as opportunities to articulate to four-year colleges and universities. Only programs approved through this process will be eligible for Perkins funds. Programs will be reviewed according to the schedule established by the CCPE and local community college.

Program of Study Implementation

Two key categories of program of study implementation work identified as central to achieving Nebraska's CTE's strategic priorities are high-quality, standards-aligned instructional materials and professional learning. Resources, strategies, and policies in these areas are key to implementing programs of study with fidelity and narrowing equity gaps across subpopulations.

Based on implementation science, Nebraska has created a framework for standards implementation that can be contextualized for CTE use. This framework describes four stages of standards implementation – exploration, initial implementation, scale-up, and deep implementation and sustainability. This work is completed across five categories - alignment and transition, assessment and accountability, professional learning, instructional resources, and communication. The NDE, educational service units, district/administration, school/administration, and teachers all have roles in this work to detect the strength of activities related to implementation.

Perkins Accountability

Perkins V requires a continued federal, state, and local commitment to performance measurement and accountability. Perkins V builds on past efforts to evaluate and improve CTE. This law gives States, school districts, and postsecondary institutions greater flexibility to design services and activities that meet the needs of their students and communities. In return for that flexibility, Perkins V establishes a rigorous State performance accountability system "to assess the effectiveness of the state in achieving statewide progress in career and technical education and to optimize the return of investment of Federal funds in Career and Technical education activities" (sec. 113(a)).

Nebraska CTE will assist educators in making a more formal shift from collecting data to using data to ensure local CTE programs create success for students and employers and reduce performance gaps for CTE concentrators, including those who are members of special populations. The quality and effectiveness of Nebraska CTE is dependent on the ability to constantly evaluate and improve. Through Nebraska's reVISION process, all local recipients are required to analyze disaggregated student performance data to identify performance disparities across student groups, detect root causes, and direct resources towards addressing both. These findings will be carried through to each recipient's annual application for Perkins funds. Within the application, a description of how concentrators from special populations are provided with programs that enable them to meet or exceed State determined levels of performance, and prepare them for further learning in high-skill, high-wage, and high-demand occupations will be included.

If a local recipient fails to meet State determined levels of performance or has made no meaningful progress, a Performance Improvement Plan must be submitted to articulate the steps that will be taken to address the performance deficiencies. This plan will need to include specific detail about how the recipient plans to address the performance gap along with strategies that will be implemented to address the gap, which may include the use of Perkins V funds. See section D(5) of this Plan for additional information.

More information about Perkins V Accountability can be found at:
https://www.education.ne.gov/nce/cte-data-research/

All required Perkins accountability data are collected for CTE Concentrators only.

A **CTE concentrator** in Nebraska is defined as:

Secondary CTE concentrator:	A secondary student who, in grades 9 through 12, has earned credit in at least two courses in a single career cluster program at the intermediate or capstone level.
Postsecondary CTE concentrator:	A postsecondary student who, in the reporting year, has earned twelve (12) credits in a *single* CTE program – or – completed a CTE program if that program encompasses fewer than twelve (12) credits.

State Determined Levels of Performance

Perkins V State Determined Levels of Performance					
Indicator	**Reporting Year**				
	Baseline (FY19)	**2021 (FY 20)**	**2022 (FY 21)**	**2023 (FY 22)**	**2024 (FY 23)**
SECONDARY					
1S1: Graduation Rate	**93.57%**	94.23%	94.89%	95.55%	96.21%
2S1: Proficiency in reading/language arts	**52.97%**	53.15%	53.33%	53.51%	53.69%
2S2: Proficiency in mathematics	**50.72%**	52.21%	53.69%	55.18%	56.66%
2S3: Proficiency in science	**55.57%**	56.81%	58.04%	59.28%	60.51%
3S1: Post-program placement	**79.05%**	80.20%	81.35%	82.50%	83.65%
4S1: Non-traditional concentration	**19.70%**	21.27%	22.85%	24.42%	25.90%
5S3: Participation in work-based learning	**5.31%**	6.70%	8.09%	9.47%	10.86%
POSTSECONDARY					
1P1: Postsecondary retention & placement	**76.08%**	77.27%	78.47%	79.66%	80.85%
2P1: Recognized postsecondary credential	**39.45%**	39.90%	40.36%	40.81%	41.26%
3P1: Non-traditional concentration	**19.54%**	20.27%	20.99%	21.72%	22.44%

Performance Indicator Definitions

Secondary Performance Indicator Definitions		
Academic Year: 2019-2020 **Perkins Reporting Year**: 2020-2021 **Enrollment/Performance Data Used**: 2019-2020 **Placement Data Used**: 2018-2019		
Secondary Student Definitions: Concentrator**:** A secondary student who, in grades 9-12, has earned credit in at least two courses in a single career cluster program at the intermediate or capstone level.		
INDICATOR	**INDICATOR DEFINITION**	**ENROLLED OR EXIT COHORT**
(1S1) Four-Year Graduation Rate	**Numerator**: The number of CTE concentrators who graduated from high school, as measured by the four-year adjusted cohort graduation rate. **Denominator**: Number of CTE concentrators who, in the reporting year, were included in the State's computation of its adjusted four-year cohort graduation rate as defined in the State's Consolidated Accountability Plan.	Exiting Students
(2S1) Academic Proficiency in Reading / Language Arts	**Numerator**: Number of CTE concentrators who achieved reading/language arts proficiency on the statewide high school reading/language arts assessment (ACT or NSCAS-Alt) and who, in the reporting year, graduated high school. **Denominator**: Number of CTE concentrators who took the statewide high school assessments in reading/language arts (ACT or NSCAS-Alt) whose scores were included in the State's ESEA accountability reporting and who, in the reporting year, graduated high school.	Exiting Students
(2S2) Academic Proficiency in Mathematics	**Numerator**: Number of CTE concentrators who achieved mathematics proficiency on the statewide high school reading/language arts assessment (ACT or NSCAS-Alt) and who, in the reporting year, graduated high school.	Exiting Students

	Denominator: Number of CTE concentrators who took the statewide high school assessment in mathematics (ACT or NSCAS-Alt) whose scores were included in the State's ESEA accountability reporting, and who, in the reporting year, graduated from high school.	
(2S3) Academic Proficiency in Science	**Numerator**: Number of CTE concentrators who achieved science proficiency on the statewide high school science assessment (ACT or NSCAS-Alt) and who, in the reporting year, graduated high school. **Denominator**: Number of CTE concentrators who took the statewide high school assessment in science (ACT or NSCAS-Alt) whose scores were included in the State's ESEA accountability reporting and who, in the reporting year, graduated high school.	Exiting Students
(3S1) Post-Program Placement	**Numerator**: The number of CTE concentrators who, in the second quarter after graduating from high school in the previous reporting year, are in postsecondary education or advanced training, military service or a service program that receives assistance under Title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(1) of the Peace Corps Act (22 U.S.C. 2504(a)) or are employed. (*Concentrators who graduated by June 30, 2018 would be assessed between October 1, 2018 and December 31, 2018*). **Denominator**: The number of CTE concentrators who graduated high school during the previous reporting year.	Previous Year / Exiting Students
(4S1) Nontraditional Program Concentration	**Numerator**: Number of CTE concentrators from underrepresented gender groups enrolled in CTE programs and programs of study that lead to non-traditional fields. **Denominator**: Number of CTE concentrators enrolled in a CTE program or program of study that leads to a non-traditional field, during the reporting year.	Active / Enrolled
(5S3) Participation in Work-based Learning	**Numerator**: Number of CTE concentrators who, in the reporting year, graduated from high school having participated in work-based learning. **Denominator**: Number of CTE concentrators who graduated from high school during the reporting year. **Work-based learning does not include workplace experience strategies that are simply awareness or exploratory in nature.*	Exiting Students

Postsecondary Performance Indicator Definitions		
Academic Year: 2019-2020 **Perkins Reporting Year**: 2020-2021 **Enrollment/Performance Data Used**: 2019-2020 **Placement Data Used**: 2018-2019		
Postsecondary Student Definition: Concentrator**:** A postsecondary student who, in the reporting year, has earned twelve (12) credits in a *single* CTE program OR completed a CTE program if that program encompasses fewer than twelve (12) credits.		
INDICATOR	**INDICATOR DEFINITION**	**ENROLLED OR EXIT COHORT**
(1P1) Postsecondary Retention and Placement	**Numerator**: Number of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under Title 1 of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(1) of the Peace Corps Act (22 U.S.C. 2504(a)) or are retained in employment. *(Concentrators who graduated by June 30, 2018 would be assessed between October 1, 2018 and December 31, 2018).* **Denominator**: Number of CTE concentrators who completed their program in the reporting year. **Retention includes students who remained enrolled in their original postsecondary institution or transferred to another 2- or 4- year institution during the reporting year.*	Previous Year/ Exiting Students
(2P1) Earned Recognized Postsecondary Credential	**Numerator**: Number of CTE concentrators who receive a recognized postsecondary credential during participation in or within one (1) year of program completion. **Denominator:** Number of CTE concentrators who left postsecondary education in the prior reporting year. **A recognized postsecondary credential includes an industry-recognized certification, a certificate of completion of an apprenticeship, an occupational licensure, an associate's degree, or a bachelor's degree.*	Active/ Enrolled; as well as Exiting Students

(3P1) Non-Traditional Program Concentration	**Numerator**: Number of CTE concentrators, from underrepresented gender groups, enrolled in CTE program and programs of study that lead to non-traditional fields during the reporting year. **Denominator:** Number of CTE concentrators enrolled in a CTE program of program of study that leads to a non-traditional field during the reporting year.	Active / Enrolled

Performance Improvement

Performance Improvement Plans will be required for recipients who failed to meet at least 90% of the state determined levels of performance for any of the core indicators of performance for all CTE concentrators. The recipient must develop and implement a program improvement plan that includes an analysis of the performance disparities or gaps and actions that will be taken to address such gaps in consultation with local stakeholders, during the first program year succeeding the program year for which the recipient failed to meet any of the levels of performance for any of the core indicators of performance.

If an eligible recipient has gaps or deficiencies in performance and no meaningful progress has been achieved prior to the third program year, the NDE will require that a percentage of local Perkins funds be used towards remediation based on consultation with Nebraska CTE staff. The eligible recipient will be required to submit an action plan to the NDE within 30 days of the consultation identifying the disparities or gaps in performance and the specific actions that will be taken. Nebraska CTE staff will review the action plan and the parties will come to a final consensus on a plan of action. One-third (or 33%) of the eligible recipients grant funds in the succeeding fiscal year must be spent on enacting the action plan approved by the NDE. The action plan will be reviewed annually and will remain in place until the disparities or gaps in performance have been resolved. Action plans should additionally reflect needs identified throughout the reVISION process that are consistent with the requirements of the Act.

The NDE may, after notice and opportunity for a hearing, withhold from the eligible recipient all, or a portion, of the eligible recipient's allotment under this title if the eligible recipient fails to implement an improvement plan with respect to any specific core indicator of performance that was identified in a program improvement plan or fails to meet at least 90 percent of the local level of performance for such core indicator for two consecutive years after the eligible recipient has been identified for improvement.

Data Reporting

CTE data are collected to support the federal reporting requirements of the Strengthening Career and Technical Education for the 21st Century Act. All definitions for data elements, the data reporting calendar, and instructions for interfacing with ADVISER are available on the ADVISER Resources home page.

Secondary:

The due date for these data is June 15. There is an audit window from June 15-June 30 when data must be finalized.

- Data submissions include grades 5-12 in districts that offer CTE courses.
- Concentrators are determined by evaluating the number of intermediate and capstone level courses in which the student earned credit within a specific career cluster – these calculations are made automatically within ADVISER. Unlike under Perkins IV, districts will not need to identify concentrators.
- Course codes must be accurate for CTE data to be calculated correctly. See https://cestandards.education.ne.gov.

All secondary CTE data are reported through ADVISER. The data element unique to CTE is Element 12 and can be found within the ADVISER Data Elements handbook. However, all data elements (i.e. course codes) must be submitted for CTE data to be accurately collected in full. Perkins V will still make use of post school survey data, so the Post Graduate Activity data elements will continue to be collected.

- Data Element 12: Postgraduate Activity – these data elements are used to provide follow-up information on the concentrators that graduated in the previous year. More information on obtaining follow-up data can be found in the Graduate Follow-Up Approaches and Resources document within the "Resources" section to the left.

Postsecondary:

1. The Postsecondary Perkins Students Template: This file collects sets of students that are enrolled in an institution during a certain academic year, and that are relevant to Perkins reporting (including all CTE Participants and Concentrators as defined here). A Postsecondary Enrollment record must be submitted for each student appearing in the Perkins Students template.

2. The Postsecondary Perkins Courses Template**:** This file collects the entire course history, though the end of the reporting academic year, for each of the students listed in the Perkins Students file. At a minimum, all courses with an REU Course Weight of 1.5 of 2.0 should be reported. A Perkins Students record must first be submitted for each student appearing in the Perkins Courses file.

Keep in mind the Postsecondary Enrollment Template as well as the Postsecondary Academic Awards Template must also be submitted by all Postsecondary institutions to avoid a data loading process rejection.

Note: Data submission includes all students who earn credit in at least one Career and Technical Education course. And, all courses related to occupational training should be weighted at least at a 1.5, per the Nebraska Community College State Aid Enrollment FTE/REU Guidelines document.

Helpful Links:

- Postsecondary File Specifications
- Data Collection Timeline

All data should be submitted via the Postsecondary Data Manager, located within the NDE Portal. A User's Guide can be found at: Postsecondary Data Manager User Guide.

Additional information can be found on the Nebraska P-20 Technical Group's website.

Grant Reimbursement & Closeout

The grant closeout process is to be completed and submitted to NDE by **October 1.**

Audit guidelines require that an itemized printout of the total expenditures attributed to the approved Career and Technical Education application for the year must accompany all claims for reimbursement. This printout must include the date of purchase, vendor, amount and description of items purchased. The printout should also provide detailed information on any personnel services charged to the Perkins grant. Additional information may be requested, such as accounting ledgers.

The following expenditure items *always* require supporting documentation including, but not limited to, purchase orders, invoices, and receipts.

- All credit card purchases
- Travel expenditures related to a conference requires adequate documentation (per 2 CFR 200.474)
- Food: generally, there is a very high burden of proof that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. There may be unique circumstances where the costs would be permissible because they are reasonable and necessary. See the section on meals within the Allowable and Nonallowable Uses of Funds section for more detailed information.
- Reimbursement to individuals
- Salaries

The NDE will review the following for all financial claims:

- Expenditures were pre-approved
- Claims reflect expenditures as reported (equipment/supply purchases must be itemized)
- No more than 5% of allocation administration fee is claimed and documented
- Documentation for Time and Effort is included for all staff and substitute teachers
- Documentation includes copies of invoices, purchase orders, or receipts
- Documentation of accounting records showing where the cost was actually paid (accounting ledger printout)

All ledgers, copies, and supporting documentation should be attached/provided to the claim form before submitting to NDE.

Following these guidelines does not necessarily guarantee reimbursement.

Allowable & Non-Allowable Uses of Perkins Funds

Expenditures funded through the Perkins grant **must ultimately enhance instruction** for students to gain knowledge and skills that meet industry standards and expectations in high-wage, high-skill, and high-demand occupations.

The following list includes allowable and non-allowable uses of Perkins funds. Note that some non-allowable expenditures have exceptions. All Perkins funds must adhere to all federal and state laws, policies, and regulations. Visit the NDE's Finance and Organizational Services website for additional information at https://www.education.ne.gov/fos/.

Administrative Costs

Administrative expenditures are limited to 5% of the total budget and can be utilized for meeting general requirements of administering the grant (records retention, financial management). The GMS system will provide the indirect cost rate for each recipient on the budget pages if selected as an option. The applicant must decide, for each program, whether to use indirect costs or not. If chosen, the system will figure the amount of indirect costs.

Note: if the budget includes equipment (capital outlay), this amount will be subtracted from the amount allowable for indirect costs as required by law.

Documentation of actual expenses must be maintained to claim the 5% administrative cost. Budget and reporting of the direct administrative expenditures should appear in the appropriate object code.

Expenses associated with conducting an advisory committee meeting may be considered a direct or indirect administrative cost.

Advertising

See "Marketing/Promotional Expenses"

Audits

The cost of a general school/institution audit is ***not permissible***, ***but*** the portion directly attributable to auditing the Perkins grant may be charged against the 5% administration category.

Awards

Cash awards, medals/pins, plaques, ribbons, trophies, etc. are ***non-allowable***.
Scholarship awards are ***non-allowable*** as these are considered a direct-benefit.

Basic Tools

Basic hand tools or tools that would not be considered innovative are ***not allowable*** (e.g. chisels, clamps, gardening tools, hammers, hand saws, levels, planes, pliers, punches, rasps, screwdrivers, tape measures, trouble lights, vise grips, wrenches). ***However***, there is an exception for ergonomic and/or state-of-the-art tools and tool kits that are part of an innovative program that combines rigorous academic instruction with CTE. Additionally, purchasing basic tools for the creation of a new program or to align with a new program of study or set of state standards is permissible.

Capital Assets/Expenditures

Building or land purchases or modifications, attachments, accessories are non-allowable. Instructional equipment costing more than $5,000 per individual item may be permissible. Capital Assets defined as equipment that costs more than $5,000 per individual item. **It is not permissible to buy residential grade equipment and seek Perkins reimbursement.** Any equipment purchased (both <$5,000 and >$5,000 per item) must be industry grade and quality to be eligible for reimbursement. Equipment is described as a movable or portable item, an implement, a device or a machine designed for a specific instructional purpose that meets the following conditions:

- Retains its original shape and appearance with use and is non-consumable (consumable supplies that are not eligible include such things as plants, potting soil, welding rods/wire, welding gas, food, printer cartridges, filament, paper, office supplies, lumber, etc.)
- It is generally repairable
- Retains its identity
- It is a necessary adaptation to upgrade an existing item of equipment in order to be consistent with current technology found in business and industry
- All equipment must be housed within CTE programs, not in general use computer or learning labs. Equipment purchased with federal funds must be used for CTE instruction purposes. For example, computers purchased using federal Perkins funds may not be used for general school clerical/office work or library/computer work.
- Equipment purchased by a consortium must be maintained and inventoried by the consortium
- All equipment must be tagged designating the source of funding as Perkins
- Equipment purchased by a stand-alone/consortium must be maintained and inventoried by the stand-alone/consortium using the local inventory process
- Periodic review or request of inventory list may occur through monitoring
- All equipment purchases must be detailed and shown on an itemized printout that is submitted with the final claim for reimbursement.
- An inventory must be maintained, which includes the make, model number, serial number, school/consortium inventory number and depreciation schedule, until the item is depreciated. The depreciation schedule used should be the same as the school depreciation schedule. In the absence of a local depreciation schedule, NDE defaults to IRS guidelines. Inventory is maintained at the consortium level.

Repair and/or maintenance of instructional equipment meeting these criteria is an eligible expenditure. General maintenance agreements for equipment not purchased under these criteria are not an eligible expenditure.

In the case of food and food science labs, residential grade equipment may be purchased with Perkins funds to modernize or expand career and technical education offerings. However, any equipment (free standing or counter top) purchased must demonstrate or showcase the most recent technology within the equipment category. For example: a low end, coil burner, electric range does not demonstrate or showcase the most recent technology in electric ranges. Residential grade washers/dryers, salt and pepper shakers, flatware, spatulas, private label products sold through home parties outlets, used/damaged or discounted because of damage, light grade plastic products (bowl toppers), etc., are not approvable and are the responsibility of the local school.

Items of equipment with an original purchase unit price of $5,000 or more must be identified in the Capital Assets category on the local application consolidated budget and final claim form. An inventory must be maintained that includes the make, model number, serial number, school/consortium inventory number and depreciation schedule, until the value of the item is less than $5,000.

The depreciation schedule used should be the same as the school depreciation schedule. In the absence of a local depreciation schedule, NDE defaults to IRS guidelines.

Equipment items with a current unit value of $5,000 or more cannot be disposed of without approval from the NDE. Disposal of items is defined as sale, trade-in, transfer, exchange or loan. If disposal is approved, the federal share of the equipment must be used for approved career and technical education purposes or returned to NDE for reallocation.

If an item of equipment is stolen, copies of letters should be submitted to the NDE to document the notification and action of law enforcement officers.

For the purposes of disposing or transferring equipment, current fair market value is determined by obtaining two signed bids from potential purchasers or two appraisals from authorized appraisers for the purpose of disposing of or transferring equipment. When the equipment is being traded in for like or similar equipment used in the same program for the same purpose, the trade in value constitutes the current fair market value of the traded in equipment.

Carry Over Funds

Perkins does ***not allow*** carry over funds for the annual grants.

Career and Technical Student Organizations (CTSO)

The following is considered ***non-allowable*** uses of Perkins funds: awards for recognition of students, advisors, or other individuals; dues (student or advisor); food for students; jackets/uniform apparel; lodging for students; printing and disseminating of non-instructional materials; registration fees to events, conferences, activities; supplies; transportation of students to CTSO conferences; student/advisor expenses at CTSO conferences.

Cost of local advisors attending CTSO conferences:

Expenses for advisors/sponsors attending CTSO conferences and/or activities are a local responsibility and are ***not allowed*** as an eligible expenditure. This would be an example of supplanting local fiscal responsibility. ***However***, districts may break out the percentage of expenses and time certify to be reimbursed for the professional development component of the conference. This is professional development beyond the competitions – not a session on how to prepare your students for competition.

Perkins can pay for time and travel for professional development that improves teaching and learning - not the supervision of students or competition preparation. Documentation would need to be provided as proof that the advisor attends those sessions and is not just there to supervise students and watch the competitions. Perkins could reimburse expenses for that percentage of time, not the entire trip because supervision of students is a local responsibility and expense.

Certifications or Certification Exams

Perkins funds ***may not be used*** to pay for an individual certification or certification exams or tests. Perkins funds may not be used to pay for obtaining an industry recognized certification. This applies to both students and teachers (e.g., Microsoft Office Specialist Certification licensing, OSHA Construction Safety Certification).

Certification *Practice* tests licensing may be allowable with prior approval and as long as they are directly tied to approved CTE programs of study. On-line college prep tests are non-allowable.

Child Care

Not approvable except in the instance of removing access or other barriers for a member of a special population, such as single parents participating in special CTE assistance programs. It is recommended to obtain prior approval by the NDE.

College Visits

Funding to transport students to and from college visits or to and from student state conferences (e.g. CTSO state leadership conferences or competitive events) would be considered direct assistance to students and therefore ***not allowable***. ***However***, expenses for CTE students to attend field trips, laboratory experiences, and CTE instruction directly related to approved CTE activities is permissible.

Computers
Computers must be of industry standard that are found in the business world and directly tied to an approved CTE program of study or other approved activity. ***Chromebooks are not approvable*** for purchase with Perkins funds as they are not industry standard.

Conferences
See "Travel".

Construction or Renovation Costs
Construction costs and materials for a permanent structure (e.g. greenhouse) or anything that becomes a part of a permanent structure are ***non-allowable*** expenditures.

Consultants
Consultant fees must be justified in the local application and pre-approved. Consulting fees plus travel, lodging, and per diem shall conform to the funded agency's written policy. Consultant travel, lodging, and per diem must be itemized in the expenditure printout.

Consumable Supplies or Equipment
Standard classroom consumable supplies are ***non-allowable***. These include but are not limited to items such as: CO2 cartridges; drill bits; food; ink; lumber; office supplies (e.g. markers, glue, shears, thank-you notes); paper; plants; potting soil; printer cartridges; replacement batteries; toner; filament, and welding rods/wire. ***However***, if the supplies or equipment is for implementing a new approved CTE program of study or updating based on alignment to state standards, supplies to start-up the program may be considered allowable. Prior approval is required.

Contingency or "petty cash" Funds
Non-allowable.

Direct Assistance to Students
Perkins funds ***may not be spent*** on direct assistance to a student on such items or activities as childcare, fees, lodging, meals, textbooks, tools, transportation, and workbooks. ***However***, there is an exception if the assistance is supporting the removal of access or other barriers for a member of a special population, such as single parents participating in special CTE assistance programs. Prior approval is typically required and the following conditions must be met:

- Recipients of the assistance must be individuals who are members of a special populations who are participating in approved CTE programs that are consistent with the goals and purposes of Perkins V.
- Assistance may only be provided to an individual to the extent that is needed to address barriers to the individual's successful participation in CTE programs.
- Direct financial assistance to individuals must be a part of a broader, more generally focused effort to address the needs of individuals who are members of special populations. Direct assistance to individuals who are members of special populations

is not by itself a program for special populations. It should be one element of a larger set of strategies designed to address the needs of special populations.

- Funds must be used to supplement, not supplant, assistance that is otherwise available from non-federal and other federal sources. For example, an eligible recipient could not use Perkins V funds to provide child care for single parents if non-federal or other federal funds previously were made available for this purpose, or if non-federal or other federal funds are used to provide child care services for single parents participating in non-career education programs and these services otherwise would have been available to CTE students in the absence of Perkins funds.
- Direct assistance should be paid to the vendor rather than the student whenever possible. Actual expenses can be reimbursed based on submission of a documented expense voucher. Costs for public transportation or a rate consistent with public transportation may be allowed only to provide student's transportation to attend an approved CTE activity. Perkins funds cannot be given to students for purchase of uniforms, equipment, or materials. Perkins funds cannot be used for car repair.

Direct assistance to a student not identified as a member of a special population or gender nontraditional is ***not permissible***.

Distance Learning Fees

These types of fess would be ***non-allowable***. This provides a direct benefit to the student.

Entertainment

Expenditures for entertainment or social activities are ***non-allowable***, such as beverages, lodging, meals, non-working meals, transportation, and gratuities.

Equipment

Instructional equipment that costs less than $5,000 per individual unit is described as a movable or portable item, an implement, a devise or a machine designed for a specific instructional purpose that meets the following conditions:

- Retains its original shape and appearance with use and is non-consumable. (Consumable supplies that are not eligible include such things as plants, potting soil, welding rods/wire, welding gas, food, printer cartridges, paper, office supplies, lumber, etc.)
- Equipment purchased using lease/purchase is approvable.
- It is generally repairable.
- Retains its identity
- It is a necessary adaptation to upgrade an existing item of equipment to be consistent with technology found in business and industry.

For equipment costing over $5,000, refer to the section above on "Capital Assets." Expenditures for equipment must be justified as a needed improvement or addition to a CTE program based on reVISION outcomes. Replacing a piece of equipment with the same piece of equipment because it is worn out is not non-allowable. Purchasing a new industry standard piece of equipment to replace outdated equipment or technology is approvable.

Equipment must also be justified by the curriculum aligned with state model programs of study. It must support the development of current and relevant skills needed in business and industry as identified throughout the reVISION process and aligned with the curriculum provided by the eligible recipient. Professional development to support the new equipment should be included.

Equipment must be retained for use by the CTE programs offered. Perkins funds cannot be used to support purchases for use by the general school population. Equipment may be depreciated using the school/colleges depreciation schedule. LEAs are responsible for keeping track of the item in their accounting records for 5-7 years. (5 years for a Perkins federal audit.) *The key is the actual current value of the equipment, not the depreciated value. Equipment with a depreciated value of $0 can be sold, however documentation must be on file and the proceeds must be refunded into the CTE program.

Basic tools and equipment such as screwdrivers, pliers, hammers, non-commercial grade plastic food storage containers, residential kitchen equipment and prep tools, etc., are ***not approvable*** and are the responsibility of the local schools. See "Basic Tools" for any exceptions.

Any equipment purchased for Food and Culinary Arts classes must be National Sanitation Foundation® (NSF®) certified meeting NSF industry standards.

Equipment for administrative or personal use is ***non-allowable***. Expenditures for equipment that is not specifically used for approved CTE courses/programs of study and housed in appropriate classrooms/labs/workshops are non-allowable. Exceptions may be made for career development/career guidance and other innovative program activities.

Equipment for building maintenance, including supplies, is ***non-allowable***.

Equipment that is mounted or becomes part of a building or structure is ***non-allowable***. Mounted TVs which are part of a CTE program may be permissible with prior justification and approval.

Equipment for a CTE school-based enterprise aligned to a CTE program of study are allowable so long as the equipment follows the same standards for industry as described above. Equipment purchased using Perkins funds may not be used or fundraisers outside of the CTE program and revenue earned must go back to support the CTE program.

Equipment must be inventoried as purchased with Perkins funds for the school, community college, or consortium and identified as such on the equipment.

Facilities

Construction, remodeling, rewiring or line installation or anything permanently affixed to a building is ***non-allowable***.

Fines and Penalties

Non-allowable.

Furniture

Standard classroom furniture not unique to CTE instruction is ***non-allowable***. Storage files or cabinets are non-allowable. ***However***, if the furniture is an integral part of an equipment workstation or to provide reasonable accommodations or remove barriers for CTE students who are members of a special population group they may be considered allowable. Prior approval is required.

Gifts, door prizes, etc.

Non-allowable.

Installation Fees

Non-allowable. Expenses for installing equipment or materials including wiring are not approvable. **However**, equipment requiring professional factory installation and training (to ensue warranty remains valid) is allowable.

Instructional Resources, Materials, and Supplies

Supplies and materials are allowable expenditures, within reason, used to meet the intent of the program. Appropriate, non-consumable instructional and curriculum materials may include reference books, audio-visual materials, instructional software, curriculum, and the necessary duplication of materials.

Textbooks are considered a part of the regular school's obligation and therefore are ***not approvable*** because of the federal guidelines on supplanting state and local resources. ***However***, when the books or curriculum are purchased for developing new curriculum not previously offered, such as implementing a new program or aligning curriculum with new program of study state standards, it may be permissible. Supplanting occurs when the school is replacing textbooks of an existing program. Online working documents that are purchased as a per student fee are not eligible for reimbursement.

Justification must be provided for expending funds on instructional materials and supplies and how they help meet the objectives of the law and local Perkins application. Justification should include a description of how the expenditure helps modernize, improve, or expand CTE offerings and aligns with industry standards and expectations and state standards.

Instructional materials must be non-consumable. Student workbooks are ***not an approvable expense***. Instructional aids that are retained by students or are consumable (one time use) are

non-allowable. Exceptions may be made on a case-by-case basis for meeting the needs of students from special populations.

Instructional materials, software, or equipment that is used in hobby, craft, leisure-arts, or other non-occupational, exploration or preparation courses are ***not approvable*** for reimbursement.

Insurance
Building, equipment, or personal/institutional insurance is ***non-allowable***.

Interest and Other Financial Costs
Non-allowable.

Kitchen Tools
Only industry-grade equipment and tools related to an approved CTE program of study are permissible. Any equipment purchased for Food and Culinary Arts classes must be National Sanitation Foundation® (NSF®) certified meeting NSF industry standards. Residential type kitchen tools are ***not allowable*** (e.g. salt and pepper shakers, flatware, dishes, spatulas, private label products sold through home party outlets, light-grade plastic products).

Leasing Vehicles
Non-allowable.

Marketing/Promotional Expenses
Promotional materials are ***not approvable***. Examples include cups/glasses, banners, folders/bags, gratuitous items, key chains, public relations costs, gifts (of any kind), notepads, pens/pencils, t-shirts, printing and disseminating of non-instructional materials.

Advertising costs are only allowable when they are for program outreach and other specific purposes necessary to meet the requirements of Perkins as well as those outlined in the Local application. Advertising costs for meetings, conventions, or other events including displays, demonstrations, and exhibits are ***non-allowable***. Costs of advertising and public relations designed solely to promote the LEA or its programs is ***non-allowable***.

Maintenance
Repair and/or maintenance of instructional equipment performed by persons other than school district employees is an eligible expenditure. General maintenance agreements for equipment not purchased with Perkins funds are not an eligible expenditure. Maintenance contracts or agreements are non-allowable.

Meals (Food and Beverage)
Banquets and meals are considered entertainment expenses and therefore ***non-allowable***. Working lunches (such as for an advisory committee meeting) may be permissible.

Expenditures for working lunches should be considered only when secondary to the meeting. In other words, the meal is not the purpose of the meeting.

The U.S. Department of Education issued "Frequently Asked Questions (FAQ) to assist U.S. Department of Education Grantees to Appropriately Use Federal Funds for Conferences and Meetings" (http://www2.ed.gov/policy/fund/guid/gposbul/faqs-grantee-conferences-may-2013.doc). The FAQ includes a number of questions regarding the use of federal grant funds to pay for food. As a general rule, the FAQ states:

Generally, there is a **very high burden of proof to show that paying for food and beverages with federal funds is necessary to meet the goals and objectives of a federal grant**. When a Local Education Agency (LEA) is hosting a meeting, the LEA should structure the agenda for the meeting so that there is time for participants to purchase their own foods, beverages, and snacks. In addition, when planning a meeting, LEAs may want to consider a location in which participants have easy access to food and beverages.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. **LEAs, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.**

To evaluate the appropriateness of using federal funds for a working lunch, an LEA should consider and provide responses to the following:

1. **Is a working lunch necessary?**
    - A working lunch is only appropriate when all key items on the agenda could not be accomplished without working through lunch.
    - LEAs should not determine that a working lunch is desired and then construct an agenda to justify that decision.
2. **Is the portion of the agenda to be carried out during lunch substantive and integral to the overall purpose of the meeting?**
    - Inspirational talks, award ceremonies, networking, or informal discussion among attendees would not be appropriate agenda items for a working lunch.
    - If a working lunch is not justifiable, an LEA might offer attendees the opportunity to reimburse the LEA for a lunch that the LEA purchases with its general funds and delivers to the meeting site.
3. **Is there a genuine time constraint that requires the working lunch?**
    - A working lunch is not permissible if lengthening the duration of the meeting would not unduly disrupt the attendee's schedule or make the day unreasonably long.
    - A working lunch may be appropriate if some participants must travel a considerable distance to attend, because, absent the working lunch, it would not be possible to cover the entire agenda and still provide participants sufficient time to return home in order to avoid the additional cost of lodging.

4. **If a working lunch is necessary, is the cost of the working lunch reasonable?**
    - A working lunch cannot contain extravagant items. It is suggested that LEAs follow state rates or another established guideline.
5. **Has the LEA carefully documented that a working lunch is both reasonable and necessary?**
    - The LEA must document its justification for using federal funds for the purpose of a working lunch, including any cost savings that result from working through lunch.

Aside from working meals that meet the above guidelines, it is unlikely that other food and beverage costs for a meeting (e.g. breakfast, dinner, snacks, or networking receptions) would be reasonable and necessary. Please remember that entertainment costs, including costs for amusement and social activities, are never allowable.

If non-federal funds are used to pay for food and beverages, the LEA should make clear through a written disclaimer or announcement (e.g., a note on the agenda for the meeting) that federal funds were not used to pay for the cost of the food or beverages.

In providing this guidance, please note that this does not preclude an LEA from paying the travel expense of those attending a conference or meeting that is necessary to carry out its education program.

The NDE may seek to recover any federal grant funds identified, in an audit or through monitoring, as having been used for unallowable costs, including unallowable food and beverage expenses

Membership/Dues, Subscriptions, and Professional Activities

Memberships for students, faculty, or administration for CTSOs, professional organizations, or societies is ***non-allowable***. Dues to professional or other organizations are ***not approvable***.

Memberships for LEAs or consortia to participate in a professional organization may be allowable. The fee must align with the overarching CTE plan for the recipient. A vendor must provide a description of exactly what the fees are for, detailed information on any personnel services charged to the grant, and the purpose of membership. The NDE will review the expenditure to determine if the cost is necessary, reasonable, and allocable to the grant, and contributes to the identified results of reVISION. LEAs must be able to rebut the presumption of supplanting.

Purchased Professional & Technical Services

Purchased services are allowable expenses, within reason, used to meet the intent of the program, and documented at the local level. Examples may include subcontractors, consultants, reimbursement for substitute teachers, training, and working meals (see more information under “meal”).

Middle School (grades 5-8)
Middle grades CTE (grades 5-8) purchases would be allowable if they are to modernize, improve or expand CTE offerings and align them to current industry standards and expectations. They must also be used for a course or courses that enhance instruction for students to gain knowledge and skills that meet industry standards and certifications in high-wage, high-skills, and high-demand occupations. The key is career skills development (*not family, personal development, or teen parenting courses*) aligned to business/industry standards and focus on H3 careers.

Remedial Courses
Remedial or developmental courses are ***not approvable***.

Salaries and Benefits
Grant funds may be used to pay staff for grant-related activities if the time spent is documented and justification is made for determining the rate of compensation. Under no circumstances is supplanting allowable. Time and effort documentation must be provided for reimbursement.

When it is permissible to use funds for staff, expenditures must be limited to only that amount that is necessary to carry out the activity. Funds cannot be used to maintain staff; however, if funds are used to establish a new program, then funds can be used to provide instructional staff for new positions for a period of not more than three years.

For the first year, Perkins funds may support up to 100% (1 FTE) of a salary. If Perkins funds are requested to support the same position for a second year, up to 50% of the salary will be allowable, with 25% of the salary considered during a third year. After the third year salaries must be supported with local funds as Perkins funds cannot be used to maintain staff.

Employee benefits are considered part of the personnel cost. These may include social security, retirement, health insurance, worker's compensation, tax-sheltered annuities, and life insurance. Personnel who are chargeable to more than one program must be time certified, and time certification records should be kept on the local level. Include all personnel that will be associated with the project. This should include the name of the person or position, how the salary/benefits were calculated, and the total salary for the project.

Please refer to the NDE's Time and Effort reporting website for additional information, including sample logs: https://www.education.ne.gov/federalprograms/time-and-effort-reporting/. Additional information can also be found in Appendix C.

Software
Instructional software is defined as software that is needed to improve the academic or technical skill development of students, is used for professional development of teachers, or to update technological resources available in the programs to industry standard. Instructional materials, including software, must enhance instruction for students to gain knowledge and skills that meet industry standards and expectations in H3 occupations. Software should align with content-area and program of study standards, and may be

reviewed by a career field specialist for approval. Software renewals are permissible as long as they meet the criteria mentioned previously.

Stipends/Extended Contract Time

Stipends may be paid to teachers or participants (other than students/clients) participating in inservice training or workshops if one of the following conditions is met:

- There is a genuine need to pay stipends. Example: The inservice training or workshop is conducted after school hours, weekends or during the summer (non-contract time). Actual expenses may also be reimbursed in addition to the stipend. OR,
- The stipend is paid in lieu of paying expenses (travel, registration, etc.). If stipends are paid, it will be necessary to check the IRS guidelines because under some circumstances stipends may be subject to Social Security and Income Tax withholding. Stipends and substitutes are paid at the local district's established rate.

Student/Staff Assessments

Individual student or staff assessments or team building products that are specific to each person are ***non-allowable***, e.g., Strengths Finders, etc.

Subcontractors

The funded agency may enter into written agreements for part of the services to be provided under the local application. Such agreement will describe the services of the subcontractor and will contain provisions assuring that the funded agency will retain supervision and administrative control over the services. Services of the subcontractor agreement must be specified in the local Perkins application. If subcontractors are used, indicate their qualifications and specific responsibilities to the local agency.

Substitute Teacher Salaries

Funds to pay for substitute teachers are an eligible expense if it allows for CTE educators to participate in professional development activities (on-contract time). Supporting documentation, such as sign-in sheets/agendas and payroll records may be requested for reimbursement. See Appendix C.

Textbooks

See "Instructional Resources, Materials, and Supplies"

Training

The cost of training provided for teacher development is allowable. This may include the cost of rental space to hold a meeting and similar expenses. Please see the section on "Meals" for more information about working lunches.

Travel

Expenditures for travel, including conference expenses, must support the requirements of the legislation and local Perkins application. In-state travel is allowable. Out-of-state travel is allowable if the grantee is unable to receive comparable information (a comparable service or conference) within the state. If the budget includes expenses for out-of-state travel, include justification under performance measures/planned activities. Examples of allowable expenses may include:

- Personnel Travel
- Board and lodging
- Mileage (paid at the local district's established rate)
- Airfare (if appropriate)

Travel expenses are limited to mileage, airfare, meals and lodging. Travel must be justified in terms of value of the travel to the successful completion of the local application.

Costs associated with participation in both in-state and out-of-state conferences are approvable as requested on the local application. The potential benefit to CTE programs should be identified on the local application for justification of conference participation.

Perkins funds cannot be used for travel outside of the United States.

Tuition/Postsecondary Fees

Any fees for students or teachers related to postsecondary education are ***non-allowable***. This includes tuition and fees associated with dual-credit or advanced placement coursework including testing.

Vehicles

Car repairs are ***not an allowable expense***. Purchasing or leasing buses, airplanes, boats, golf carts, and motorcycles are not allowable. Purchasing of automobiles, tractors, and trailers may be approvable.

Justification for approval indicating how the cost is necessary and reasonable and allocable to the grant will be required. Decisions will be made on a case-by-case basis. Specific information necessary for consideration includes:

- A detailed description of how the vehicle purchase is "reasonable and necessary" and will only be used for Perkins-related activities
    - The purchase must be justified for instructional purposes only (transportation of faculty or students is not permitted)
    - Documentation and certification of any miles driven and justified as instructional only (student instruction)
- In 2 CFR part 200 (Federal guidelines) it states that recipients should assess whether it is a better deal to buy or lease the vehicle. Is there possibility of getting the vehicle donated, developing partnerships for a future donation, if/how costs may be shared (not just a grant funded purchase), etc.?
- What will the replacement plan entail? Has this been run past the risk management department?
- What is the policy for use of the vehicle at a reasonable and justified rate? See CFR 200.313 (c)(2)

- If the vehicle is later sold, that amount will need to be returned to the NDE and NDE will then need to send the funds back to the Federal granting agency

APPENDIX A

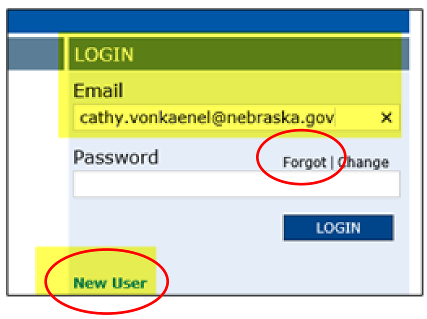
Grants Management System (GMS)

There are several different Business Roles activation codes available for the Grant Management System:

- **District Administrator (Dist Admin):** This role allows access for data entry; ability to sign the assurances and submit the application, future amendments; accessing reimbursements; and submitting claims. NOTE: The District Administrator is the only role that has the "Submit to NDE" button for submitting applications. However, District Admin (DA) and the Bookkeeper role can submit reimbursement requests.
- **Data Entry:** This role allows access for data entry to the application and payments submission to the District Administrator but does not allow for submitting to NDE.
- **Bookkeeper:** This role allows rights to the application and access to the payment portion of the GMS. NOTE: The bookkeeper role has the "Submit to NDE" button for submitting reimbursement requests and corresponding documentation only.
- **View Only:** This role allows view only rights to the application pages and payment portion of the GMS.

EACH USER SHOULD LOG IN WITH HIS/HER OWN USER ID AND PASSWORD
The Authorized Representative should not permit use of his/her login information by other individuals.

Getting Started



1. First-time users go to the GMS login page: https://nde.mtwgms.org/NDEGMSWebv02/logon.aspx.
2. Enter your email address and then click on the New User request button. Complete the popup window questions and submit to your Administrator.

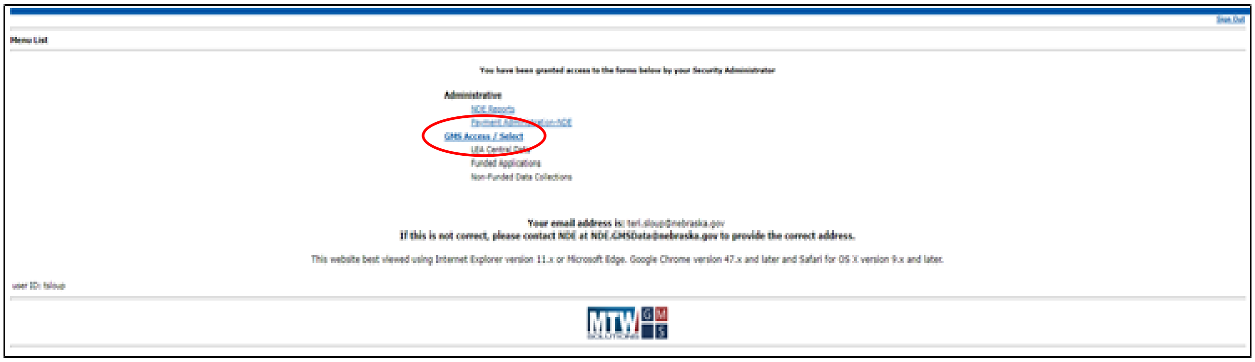
   The Administrator will need to approve the access requests for their agency through the User Maintenance link found on the Menu List within GMS. The Administrator controls who can use the system for their agency and at what level.
3. Once the account is created and approved the user logs in with their email (the system now recognizes the user's role approved by the Administrator) and clicks "Forgot." They will receive an email with a temporary password and follow the popup window instructions.

APPENDIX B

Perkins Application and Budget Instruction

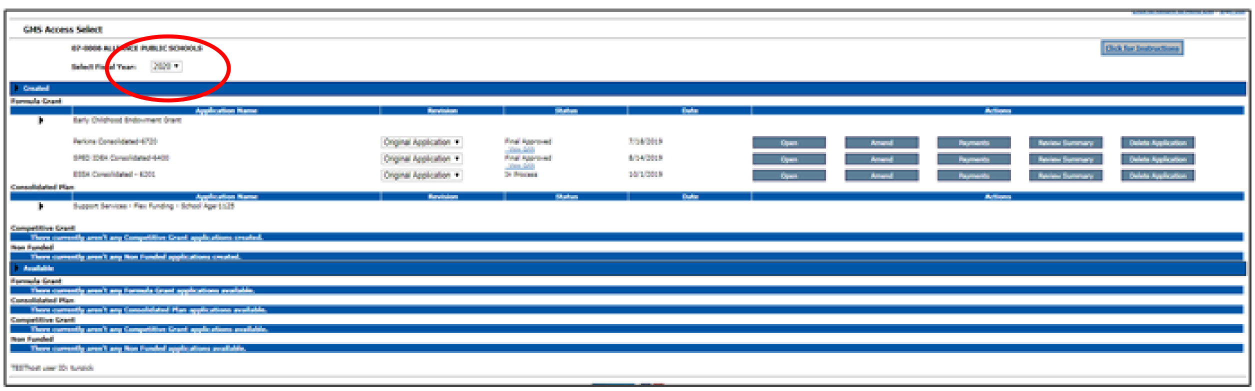
Login with your email address and password. This password will be good for 90 days.

This will open the Menu List for the Grants Management System (GMS)



Select the **GMS Access / Select** link to open the Grants Management System.

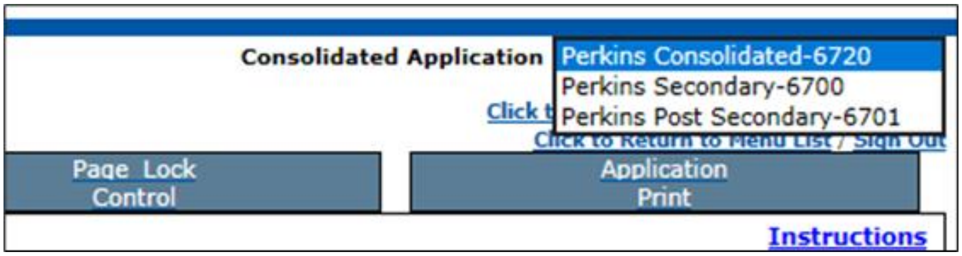
Check that the new Fiscal Year is showing. You may need to select the year from the drop-down box.



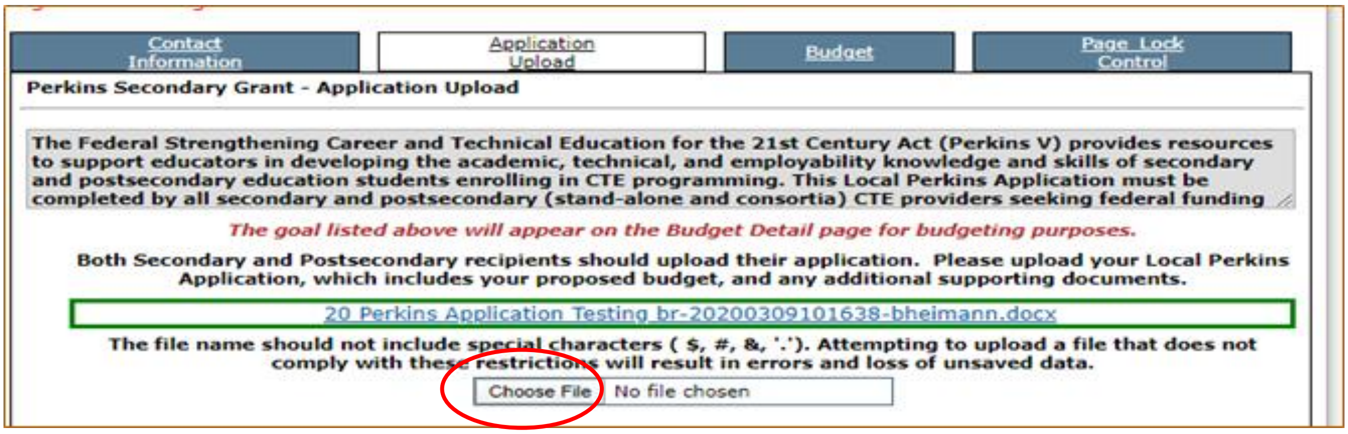
Click on the “Create” button across from the application you are creating.

You are now in the Perkins Consolidated-6720 section of the Application. Review each of the tabs. Assurances will need to be submitted to NDE before the application can be submitted. These can only be submitted by the Administrator.

Select from the drop-down menu in the upper right-hand corner. Here you will select either Secondary or Postsecondary pages to complete for your grant.



This opens the Application's detail pages. Click on Application Upload tab.



Click on "Choose File" and browse to your file locations. Select the file and click on "Upload" button. *Please upload your four-year Application and the corresponding Excel Budget sheet.* The text "No files are currently uploaded for this page" will change to the name of each file uploaded. Upload as many files as needed. This may need to be done one file at a time.

Click the Save Page button to lock the files to the application.

Click on the Budget tab. This opens Budget Detail and Budget Summary tabs. The budget you need to complete in the Budget Detail tab is a summary budget just for the upcoming grant year. Complete the budget in alignment with the uploaded budget worksheet and the outcomes of the reVISION process.

New for Perkins V: there will not be a budget to create for each activity. These activities should be written in the four-year application.

Based on the Action Steps identified for each element for the program years, detail your budget request for the upcoming program year. List all direct costs associated with the implementation of the proposed activities/action steps that are allowable and justified. Click on "Calculate Totals" and "Save" button to save the page.

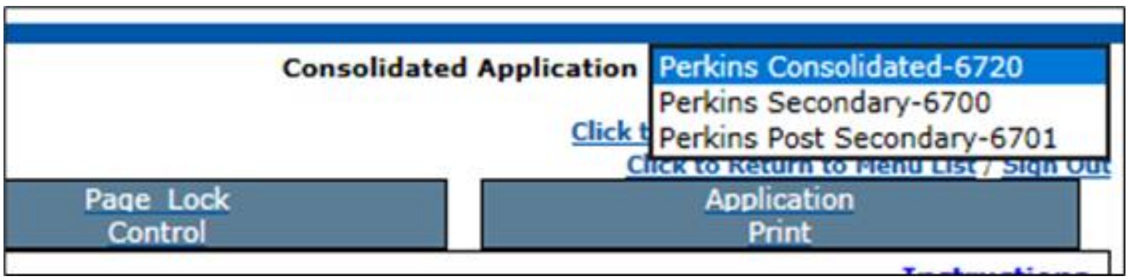
If you use the same budget code twice, you will receive an error message: Function Code has been selected on more than one row. Please use Function Code only once within the same

Topic. If this happens, you can Delete a row on the far right-hand column or edit the Function Code.

Click on and review the Budget Summary tab. This page is Read Only and shows a snapshot of your requested funding.

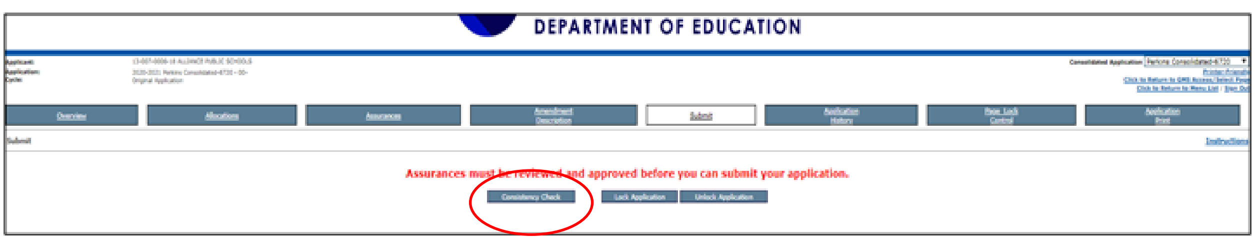
If you try to leave a page before saving your data, you may receive an error message box:

Click Cancel button and return.



Return to the Perkins Consolidated-6720 from the drop-down box in the upper right-hand corner.

The Assurances (in the Assurances tab) should be approved by the District Administrator if not already done.



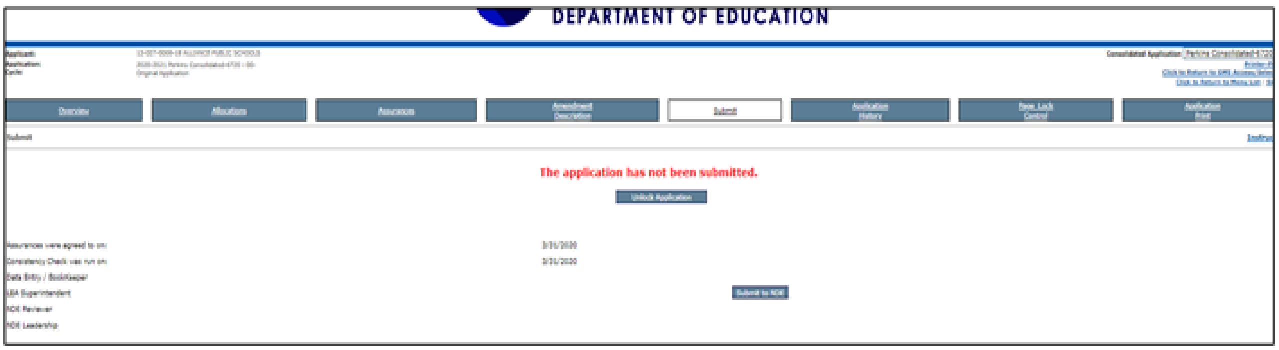
Click on the Submit Tab and then the “Consistency Check” button.

If any errors are found by the Consistency Check process, they will be listed by the section where they are found. See examples below:

Consistency Check completed. After correcting the errors noted below, the consistency check must be performed again.

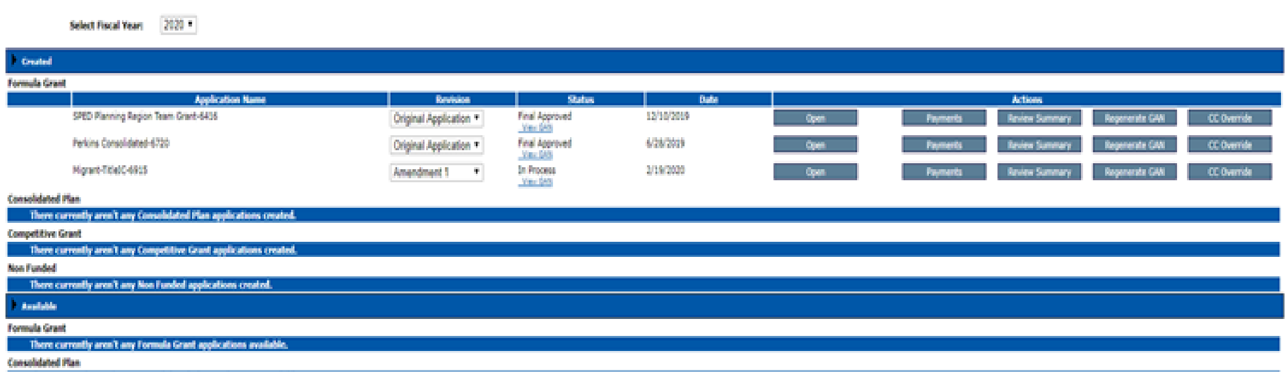
Perkins Consolidated-6720

- *Passed consistency check.*
  - *Perkins Secondary-6700*
    - *Contact Information - Authorized representative information is required.*



If no errors are found after running a consistency check, a Submit to NDE button will appear:

After submitting, you can check on your grant's progress by opening the Application History tab.



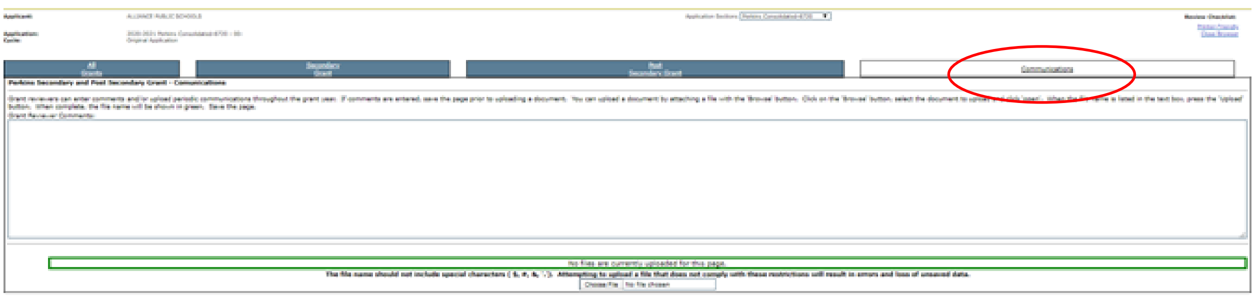
The "Review Summary" button also provides the status of the application and who needs to review and approve it. The Review Summary can be accessed from the Access / Select page.

When accessing the Review Summary, select the radial button next to the person reviewing your grant (your Grant Monitor).

Click on the "Review Checklist" button.

(Be sure you do not have your "Pop up Blocker" turned on or the page will not open until you release the blocker.)

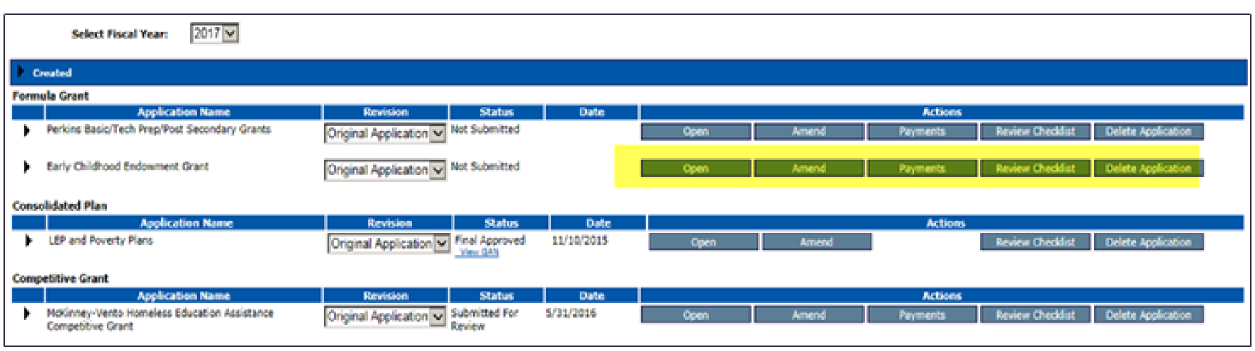
This opens the Communications side of the Grants Management System.



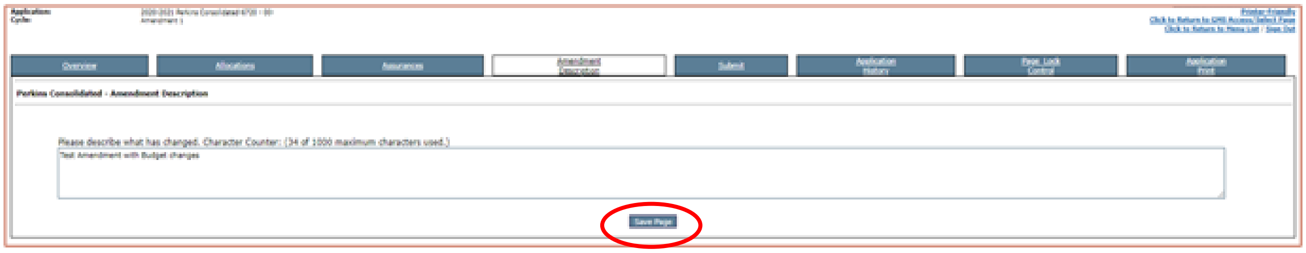
If no follow up is requested within in the Communications, you can now sign out of GMS .

Creating Amendments

Open the approved application. Click on the "Amend" button under the Actions Column. This creates a new Amendment with the Number 1 in the Revision column. Click on the "Open" button. This opens the Application and its Tabs.



Click on the Amendment Description tab to open a description text box where all changes need to be listed for NDE's review. Save Page when finished.



The amendment description text box must have a "Save Page" button available. If none show, the Application may need to be "unlocked" within the Page Lock Control Tab.

Go to the Budget page and make revisions on the allocated amounts into a new or revised categories. Calculate totals. "Save Page" when finished.

Go to the Submit Tab. Rerun Consistency Check and "Submit". This forwards the amendment to the District Administrator. The District Administrator approves the amendment. The amendment is forwarded to NDE for final Approval. An automatic notification is sent to the NDE monitor that an amendment has been submitted for review.

The status of the amendment's submission can be reviewed within the Review Summary tab.

*Because the application was previously submitted and approved by NDE, it is set to a Locked Status. Pages can be unlocked for changes in the Page Lock Control tab and may need to be unlocked before creating an amendment.

To reduce the number of amendments, the expenditures for a major object code can exceed the approved budget by 25% or $2,500 (whichever is greater) before an amendment is needed provided there are no program restrictions on that activity or major object code (e.g., an administrative cost limitation). A sub-category or budget line item must exist in the annual budget (money budgeted and previously approved for the line item) in order to move money into it without prior approval. Keep in mind that a budget category for $0.00 has no flexibility.

Budgets

A budget is a statement of anticipated costs for which grant funds would be used in support of the activities and strategies proposed to meet grant program goals. The budget is of equal importance to the narrative and can be approached as an important final check in clarifying the practical application of the program.

Budgets will use whole dollar amounts only.

Before developing a project budget, the applicant must have an understanding of the regulations and requirements of the funding source (State and/or Federal funding agency).

This includes allowable direct costs, indirect costs, assurances, project forms and instructions, and changes permitted in a budget once the project is approved.

These documents and other supporting information must be maintained by the grant recipient and will be used by NDE staff and local auditors to determine fiscal and program compliance.

Major Object Codes: Identifies the object of expenditures for each activity. Major object codes are 100 – Salaries, 200 – Employee Benefits, 300 – Professional & Technical Services, 400/500/800 – Other Purchased Services, 600 – Supplies, 700 – Capital Assets.

APPENDIX C

Time and Effort Guidance

For the most up-to-date guidance, visit the NDE's Federal Program's website:
https://www.education.ne.gov/federalprograms/time-and-effort-reporting/

What documentation should be kept for time and effort under the new EDGAR?

Time and effort must be documented appropriately for any employee compensation that is paid, in full or in part, with federal funds. The new EDGAR does not list specific types of documentation for time and effort, rather it lists seven characteristics of documentation that must be met. Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

i. Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;

ii. Be incorporated into the official records of the non-Federal entity;

iii. Reasonably reflect the total activity for which the employee is compensated by the nonFederal entity, not exceeding 100% of compensated activities (for IHE, this per the IHE's definition of IBS);

iv. Encompass both federally assisted and all other activities compensated by the nonFederal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;

v. Comply with the established accounting policies and practices of the non-Federal entity (See paragraph (h)(1)(ii) above for treatment of incidental work for IHEs.); and

vi. [Reserved for future use in regulations]

vii. Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity

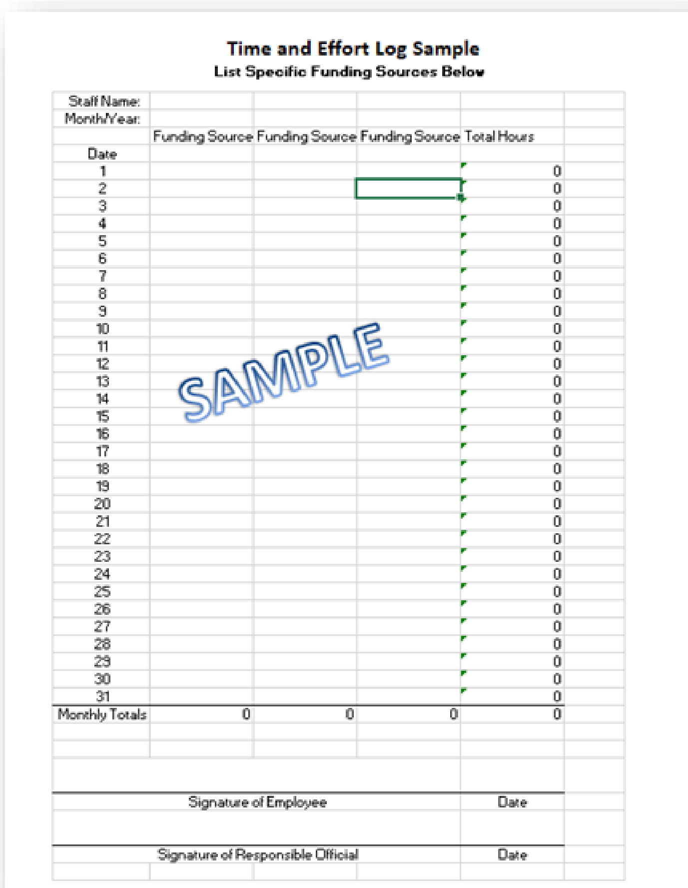
viii. Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:

(A) The system for establishing the estimates produces reasonable approximations of the activity actually performed;

(B) Significant changes in the corresponding work activity (as defined by the non-Federal entity's written policies) are identified and entered into the records in a timely manner. Short term (such as one or two months) fluctuation between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term; and

(C) The non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal awards based on budget estimates. All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated. TEA’s recommendation, at this time, is to continue to maintain your existing system of documentation for time and effort if it currently meets A-87, A-21, or A-122, as applicable, compliance requirements.

For more information and samples see: www.education.ne.gov/federalprograms/time-and-effort-reporting/



Time and Effort Log Sample

List Specific Funding Sources Below

Staff Name:				
Month/Year:				
	Funding Source	Funding Source	Funding Source	Total Hours
Date				
1				0
2				0
3				0
4				0
5				0
6				0
7				0
8				0
9				0
10				0
11				0
12				0
13				0
14				0
15				0
16				0
17				0
18				0
19				0
20				0
21				0
22				0
23				0
24				0
25				0
26				0
27				0
28				0
29				0
30				0
31				0
Monthly Totals	0	0	0	0

Signature of Employee — Date

Signature of Responsible Official — Date

Does a substitute teacher require time and effort records since substitutes are considered employees of the LEA?

Time and effort must be documented appropriately for any employee compensation that is paid, in full or in part, with federal funds. The subgrantee generally will either have a policy or procedure that all substitute pay is paid from state and/or local, not federal or state grant, funds or the substitute pay follows the same pay as the staff members for whom the substitute is working. If the substitute pay follows the employees funding distribution, the LEA's after-the-fact documentation must identify the teacher or staff for whom the substitute is working. Either a statement signed by the substitute or other system documentation would be sufficient.

Nebraska's Substitute/Alternate Reporting System:

NDE has established the following substitute system for time and effort reporting.

A. To be eligible to document time and effort under the substitute system, employees must

- Currently work on a schedule that includes multiple activities or cost objectives that must be supported by monthly personnel activity reports;
- Work on specific activities or cost objectives based on a predetermined schedule; and
- Not work on multiple activities or cost objectives at the exact time on their schedule.

B. Under the substitute system, in lieu of personnel activity reports, eligible employees may support a distribution of their salaries and wages through documentation of an established work schedule that meets the standards. An acceptable work schedule may be in a style and format already used by the District.

C. Employee schedules must:

- Indicate the specific activity or cost objective that the employee worked on for each segment of the employee's schedule;
- Account for the total hours for which each employee is compensated during the period reflected on the employee's schedule; and
- Be certified at least semiannually and signed by the employee AND a supervisory official having firsthand knowledge of the work performed by the employee.

D. Any revisions to an employee's established schedule that continue for 2 weeks or more must be documented and certified in accordance with the requirements.

E. Any significant deviations from an employee's established schedule, that require the employee to work on multiple activities or cost objectives at the exact same time, including but not limited to lengthy, unanticipated schedule changes, must be documented by the employee using a Personnel Activity Report (PAR) that covers the period during which the deviations occurred.

If an employee meets the above requirements, semiannual certification, supported by a set schedule, will be accepted.

Can we use federal funds to pay teachers on payroll for stipends the LEA gives to teachers for things like having a master's degree, being bilingual, teaching dual credit, or teaching in a high-need area such as science and math?

Federal funds may pay for salary and benefits for positions that benefit the federal program. Stipends for an advanced or preferred degree or specific position may be paid from federal funds only in the same manner that is consistent with local salary schedules and local policy. Note that if stipends are paid with federal funds, time and effort documentation must be maintained and the amount to be paid from federal funds must be reasonable and necessary.

If a staff member is paid 100% with federal funds, what type of documentation do we keep for time and effort?

Time and effort must be documented appropriately for any employee compensation that is paid, in full or in part, with federal funds. The new EDGAR does not list specific types of documentation for time and effort, rather it lists seven characteristics of documentation that must be met.

APPENDIX D

Change Summary

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NEBRASKA DEPARTMENT OF EDUCATION